

SPALDING, et al. vs. CITY OF CHICAGO

August 12, 2015

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JANET HANNA
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<p style="text-align: right;">5</p> <p>1 Q. And is that Mr. Taren?</p> <p>2 A. Yes.</p> <p>3 Q. You've retained Mr. Taren to represent</p> <p>4 you?</p> <p>5 A. Yes.</p> <p>6 Q. When did you retain Mr. Taren to</p> <p>7 represent you?</p> <p>8 A. Three days ago.</p> <p>9 Q. And can you tell me what, if anything,</p> <p>10 you did to prepare for your deposition today?</p> <p>11 A. We went over my affidavit.</p> <p>12 Q. You and Mr. Taren?</p> <p>13 A. Yes.</p> <p>14 Q. Were there any other documents that</p> <p>15 Mr. Taren showed you or that you otherwise looked</p> <p>16 at in preparation for your deposition today?</p> <p>17 A. No.</p> <p>18 Q. Did you meet with Shannon Spalding</p> <p>19 or Dan Echeverria about your deposition today?</p> <p>20 A. No.</p> <p>21 Q. Did you meet with anyone other than</p> <p>22 Mr. Taren in preparation for your deposition today?</p> <p>23 A. No.</p> <p>24 Q. Can you please give me your current home</p>	<p style="text-align: right;">7</p> <p>1 disability, correct?</p> <p>2 A. Correct.</p> <p>3 Q. And if you had been granted duty</p> <p>4 disability, what would be the difference in that</p> <p>5 versus ordinary disability?</p> <p>6 A. 75 percent tax free and free insurance</p> <p>7 until you're 63.</p> <p>8 Q. So fair to say there's a pretty</p> <p>9 significant difference between ordinary disability</p> <p>10 and duty disability?</p> <p>11 A. Absolutely.</p> <p>12 Q. And also fair to say I'm imagining that</p> <p>13 you think the City was wrong in rejecting your</p> <p>14 request for duty disability?</p> <p>15 MR. TAREN: Objection.</p> <p>16 BY MR. KING:</p> <p>17 Q. You can answer.</p> <p>18 A. Absolutely.</p> <p>19 Q. Are you angry that the City rejected</p> <p>20 that request?</p> <p>21 MR. TAREN: I'm going to object to the use of</p> <p>22 the City, the term "City" in these questions. The</p> <p>23 pension board makes the decision, not the City.</p> <p>24 BY MR. KING:</p>
<p style="text-align: right;">6</p> <p>1 address?</p> <p>2 A. 4953 North Meade Avenue, M-e-a-d-e.</p> <p>3 That's Chicago, Illinois 60630.</p> <p>4 Q. And a home phone number?</p> <p>5 A. I only have a cell.</p> <p>6 Q. I'll take that.</p> <p>7 A. 773-620-9337.</p> <p>8 Q. And are you currently employed?</p> <p>9 A. I am on disability with the Chicago</p> <p>10 Police Department.</p> <p>11 Q. And what does that mean exactly that</p> <p>12 you're on disability?</p> <p>13 A. I was awarded ordinary disability, which</p> <p>14 means I'm receiving 50 percent of my pay.</p> <p>15 Q. And have you sought some other status</p> <p>16 other than ordinary disability?</p> <p>17 A. Yes. I sought for duty disability, at</p> <p>18 which time on May 29th of 2015 I was denied and</p> <p>19 have since filed an appeal with the Circuit Court</p> <p>20 of Cook County.</p> <p>21 Q. And so you have a pending appeal right</p> <p>22 now with the Circuit Court of Cook County?</p> <p>23 A. Correct.</p> <p>24 Q. And so the City denied you the duty</p>	<p style="text-align: right;">8</p> <p>1 Q. Well, are you angry that your request</p> <p>2 for duty disability was denied?</p> <p>3 A. No, I'm not angry. I'm disappointed.</p> <p>4 Q. Do you have any sense of when your</p> <p>5 appeal will be ruled on?</p> <p>6 A. I do not.</p> <p>7 Q. I want to ask a little bit about your</p> <p>8 educational background. Where did you attend high</p> <p>9 school?</p> <p>10 A. I went to Regina Dominican High School</p> <p>11 in Wilmette, Illinois.</p> <p>12 Q. And did you graduate?</p> <p>13 A. I did.</p> <p>14 Q. What year?</p> <p>15 A. 1986.</p> <p>16 Q. And have you had any formal education</p> <p>17 after high school?</p> <p>18 A. I went to Western Illinois University</p> <p>19 for a short time.</p> <p>20 Q. You did not obtain a degree at Western</p> <p>21 Illinois?</p> <p>22 A. I did not.</p> <p>23 Q. How long were you at Western Illinois?</p> <p>24 A. I was there for approximately two</p>

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<p style="text-align: right;">9</p> <p>1 months.</p> <p>2 Q. Okay. And have you had any other formal</p> <p>3 education other than high school and Western</p> <p>4 Illinois University?</p> <p>5 A. We receive credits, college credits for</p> <p>6 our education that we receive in the Police</p> <p>7 Academy.</p> <p>8 Q. Any other formal education?</p> <p>9 A. No.</p> <p>10 Q. You mentioned the Police Academy. Are</p> <p>11 you a sworn police officer?</p> <p>12 A. I was.</p> <p>13 Q. And when you say you were, you mean</p> <p>14 before you went out on disability or --</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So you attended the Police</p> <p>17 Academy?</p> <p>18 A. Yes, I did.</p> <p>19 Q. Prior to attending the Police Academy,</p> <p>20 did you have any other employment?</p> <p>21 A. Yes.</p> <p>22 Q. Can you tell me about your employment</p> <p>23 that preceded your employment with the Chicago</p> <p>24 Police Department?</p>	<p style="text-align: right;">11</p> <p>1 Fugitive Apprehension Unit. What was your first</p> <p>2 assignment out of the Police Academy?</p> <p>3 A. 25th District.</p> <p>4 Q. That was just as a police officer?</p> <p>5 A. Yes.</p> <p>6 Q. And how long were you in the</p> <p>7 25th District?</p> <p>8 A. Approximately three years.</p> <p>9 Q. Okay. And what happened next?</p> <p>10 A. Then I went to school patrol. I was a</p> <p>11 school officer. And I was there --</p> <p>12 Q. How long -- I'm sorry.</p> <p>13 A. I was there approximately five years.</p> <p>14 Q. And what was your next position?</p> <p>15 A. Alternate response section.</p> <p>16 Q. Is that like 311 center?</p> <p>17 A. Correct.</p> <p>18 Q. How long were you there?</p> <p>19 A. Five to six years.</p> <p>20 Q. And what was your next position?</p> <p>21 A. Area 5 Detective Division.</p> <p>22 Q. How long?</p> <p>23 A. Three years.</p> <p>24 Q. What was your next position?</p>
<p style="text-align: right;">10</p> <p>1 A. I was a bank teller at Columbia National</p> <p>2 Bank while I was in high school. Then I was a</p> <p>3 waitress at a restaurant in Wisconsin Dells for</p> <p>4 many years. And then I was a blackjack dealer at</p> <p>5 Ho-Chunk Casino in Baraboo, Wisconsin.</p> <p>6 Q. Any other employment?</p> <p>7 A. No.</p> <p>8 Q. Did any of those employment situations</p> <p>9 end involuntarily for you? In other words, were</p> <p>10 you ever fired from any of these jobs?</p> <p>11 A. Never.</p> <p>12 Q. You voluntarily left each of these jobs?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And when did you enter, what year or</p> <p>15 month, if you know, enter the Police Academy?</p> <p>16 A. 31 May, '94.</p> <p>17 Q. And when was your graduation from the</p> <p>18 Police Academy?</p> <p>19 A. December of '94.</p> <p>20 Q. I know it's been a number of years, but</p> <p>21 I'm going to ask you to sort of recount for me all</p> <p>22 of your assignments where you worked within the</p> <p>23 Chicago Police Department, let's say,</p> <p>24 chronologically leading up to when you joined the</p>	<p style="text-align: right;">12</p> <p>1 A. Fugitive Apprehension.</p> <p>2 Q. Okay. Do you recall what month and year</p> <p>3 you joined the Fugitive Apprehension Unit?</p> <p>4 A. I believe to the best of my knowledge it</p> <p>5 was January of 2012.</p> <p>6 Q. And in your work in Fugitive</p> <p>7 Apprehension or any of your prior positions with</p> <p>8 the Chicago Police Department, have you ever been</p> <p>9 the subject of discipline?</p> <p>10 A. No.</p> <p>11 Q. In the Fugitive Apprehension Unit or any</p> <p>12 of the prior positions within the Chicago Police</p> <p>13 Department have you ever been the subject of a</p> <p>14 CR number?</p> <p>15 A. Yes.</p> <p>16 Q. How many times have you been the subject</p> <p>17 of a CR?</p> <p>18 A. I would say a handful.</p> <p>19 Q. Can you tell me what you recall about</p> <p>20 each of those cases, what the allegations were</p> <p>21 against you?</p> <p>22 A. The allegations were police brutality.</p> <p>23 Q. In all of the cases police brutality?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">13</p> <p>1 Q. And were any of the CRs sustained or, in</p> <p>2 other words, they found against you?</p> <p>3 A. No.</p> <p>4 Q. You were exonerated on all of them?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Other than your pending case</p> <p>7 with respect to your duty disability, have you been</p> <p>8 involved in any other lawsuits? And when I say</p> <p>9 "involved," I mean as either a plaintiff bringing</p> <p>10 the lawsuit or a defendant, someone who's been</p> <p>11 sued?</p> <p>12 A. Yes.</p> <p>13 Q. How many times have you been a party to</p> <p>14 a lawsuit?</p> <p>15 A. Twice.</p> <p>16 Q. And were both of those cases in</p> <p>17 connection with your work for the police</p> <p>18 department?</p> <p>19 A. No.</p> <p>20 Q. Were either of those cases in connection</p> <p>21 with your work for the police department?</p> <p>22 A. No.</p> <p>23 Q. Why don't you tell me about the earliest</p> <p>24 case and then the second case?</p>	<p style="text-align: right;">15</p> <p>1 were you always an administrative assistant while</p> <p>2 you were in Fugitive Apprehension?</p> <p>3 A. I was always an administrative</p> <p>4 assistant.</p> <p>5 Q. And were your duties under that title</p> <p>6 essentially the same from when you started in the</p> <p>7 unit until the time that you went on medical</p> <p>8 leave?</p> <p>9 A. No, they changed throughout.</p> <p>10 Q. Okay. Let's talk about what were your</p> <p>11 initial duties when you joined the unit as an</p> <p>12 administrative assistant.</p> <p>13 A. My original duties and the reason why I</p> <p>14 was brought to that unit was to form a database for</p> <p>15 the unit to keep track of all of the officers'</p> <p>16 assignments because prior to that there was no</p> <p>17 database. There was no accountability. Sergeants</p> <p>18 didn't know what their officers were working, you</p> <p>19 know, that sort of thing.</p> <p>20 So I myself and Coleen Dugan were</p> <p>21 brought to the unit from Commander Salemme, who was</p> <p>22 the commander at Area 5, and we both worked at</p> <p>23 Area 5 together. He brought us to Fugitive</p> <p>24 Apprehension. That's where he was transferred.</p>
<p style="text-align: right;">14</p> <p>1 A. The first case was filed in February</p> <p>2 of 2015 and that is for a divorce.</p> <p>3 Q. Did you make the filing?</p> <p>4 A. I did. And the other case was filed</p> <p>5 in I want to say '95 and that was for a divorce,</p> <p>6 as well.</p> <p>7 Q. Were these divorce proceedings filed in</p> <p>8 Cook County, Illinois?</p> <p>9 A. Yes.</p> <p>10 Q. Is the most recent proceeding still</p> <p>11 pending or are you divorced?</p> <p>12 A. Still pending.</p> <p>13 Q. Do you have any children?</p> <p>14 A. I do.</p> <p>15 Q. You mentioned your current home address.</p> <p>16 Who lives at that address with you?</p> <p>17 A. My one daughter.</p> <p>18 Q. How old is your daughter?</p> <p>19 A. 24.</p> <p>20 Q. When you started at in the Fugitive</p> <p>21 Apprehension Unit in approximately January of 2012,</p> <p>22 what was your position at that time?</p> <p>23 A. Administrative assistant.</p> <p>24 Q. And did your position change at all or</p>	<p style="text-align: right;">16</p> <p>1 And those were our duties, to develop a database</p> <p>2 and to be able to keep track of all of the</p> <p>3 assignments. And then after that, that's when I</p> <p>4 began giving out assignments.</p> <p>5 Q. Okay. So you and Coleen Dugan had</p> <p>6 previously worked together under Commander Salemme</p> <p>7 in Area 5?</p> <p>8 A. Yes.</p> <p>9 Q. And he left to go to Fugitive</p> <p>10 Apprehension and essentially took the two of you</p> <p>11 along with him?</p> <p>12 A. Yes.</p> <p>13 Q. Other than creating this database and</p> <p>14 then beginning to give out assignments, did you</p> <p>15 have any other responsibilities when you first</p> <p>16 started in Fugitive Apprehension?</p> <p>17 A. No.</p> <p>18 Q. When you first started in Fugitive</p> <p>19 Apprehension, how were assignments being given out</p> <p>20 until this database was created, if you know?</p> <p>21 A. Randomly. From January until March they</p> <p>22 were given out randomly. We had a north team, a</p> <p>23 south team, and a central team. So needless to</p> <p>24 say, if it was a south, an incident that occurred</p>

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<p style="text-align: right;">17</p> <p>1 south, we would give it to south team, any member</p> <p>2 from the south team. If it was north, we would</p> <p>3 give it to a member on the north team. And if it</p> <p>4 was -- you understand.</p> <p>5 Q. Sure. And that was the case after you</p> <p>6 created the database --</p> <p>7 A. Yes.</p> <p>8 Q. -- that you would --</p> <p>9 MR. TAREN: Wait for the question.</p> <p>10 BY MR. KING:</p> <p>11 Q. -- that you would typically give</p> <p>12 assignments depending on where the offender is or</p> <p>13 their last known address? As you said, if it's an</p> <p>14 offender on the north side, you would typically</p> <p>15 assign it to a north side team. If it's somebody</p> <p>16 with a south side address, you would typically</p> <p>17 assign it to the south side team, correct?</p> <p>18 A. Correct.</p> <p>19 Q. Is it your testimony that I guess we'll</p> <p>20 call it the new system or database was effective in</p> <p>21 about March of 2012? Is that what you testified?</p> <p>22 A. I would say that it was up and running</p> <p>23 by February.</p> <p>24 Q. Okay. And when you joined Fugitive</p>	<p style="text-align: right;">19</p> <p>1 never any difference between a task force officer</p> <p>2 and another officer.</p> <p>3 Q. Okay. So it's your testimony that</p> <p>4 Lieutenant Cesario never instructed you in any</p> <p>5 manner about the types of cases that should go</p> <p>6 to task force officers and the types of cases that</p> <p>7 should go to non-task officers? Is that your</p> <p>8 testimony?</p> <p>9 A. No, that's not my testimony. Initially</p> <p>10 when I went to the unit I was not instructed to do</p> <p>11 that. Once we had relocated to Harrison and Kedzie</p> <p>12 that is when he came out with a list of who was on</p> <p>13 teams, north, south, and central, and he wrote next</p> <p>14 to their names TFOs and he wanted them to receive</p> <p>15 top five cases.</p> <p>16 Q. And do you recall when that move to</p> <p>17 Harrison and Kedzie took place?</p> <p>18 A. Approximately June, 2012.</p> <p>19 Q. And you're saying that's the first</p> <p>20 time that you learned about top five cases or any</p> <p>21 difference in cases that should be assigned to</p> <p>22 task force officers and non-task force officers?</p> <p>23 A. Yes.</p> <p>24 Q. You said there was something in writing</p>
<p style="text-align: right;">18</p> <p>1 Apprehension, was Lieutenant Cesario already in the</p> <p>2 unit?</p> <p>3 A. Yes.</p> <p>4 Q. And at any time after you joined the</p> <p>5 unit, did anyone give you any instructions on how</p> <p>6 assignments were to be given out?</p> <p>7 A. Yes. That was our job by</p> <p>8 Lieutenant Cesario. We worked directly for</p> <p>9 him and he instructed us to come up with this</p> <p>10 database and give out assignments based on</p> <p>11 where the offender lives.</p> <p>12 Q. Okay. And you're aware that in the</p> <p>13 Fugitive Apprehension Unit there were what were</p> <p>14 known as task force officers and also non-task</p> <p>15 force officers, correct?</p> <p>16 A. Correct.</p> <p>17 Q. The task force officers means they had</p> <p>18 been essentially -- why don't you tell me your</p> <p>19 understanding of the difference between that.</p> <p>20 A. When I first arrived to the unit, I was</p> <p>21 told that there were task force officers, but there</p> <p>22 was never any instruction as to what a task force</p> <p>23 officer was, you know, able to get or what</p> <p>24 assignment they were supposed to get or there was</p>	<p style="text-align: right;">20</p> <p>1 to that effect?</p> <p>2 MR. TAREN: Objection.</p> <p>3 BY MR. KING:</p> <p>4 Q. I believe you said there was a --</p> <p>5 Cesario gave you a list of some sort that made that</p> <p>6 indication on it?</p> <p>7 A. He just gave us a list of teams, north</p> <p>8 team, south team, central team, and next to the</p> <p>9 officers who were task force officers it said TFO.</p> <p>10 Q. I see. But you said Lieutenant Cesario</p> <p>11 instructed you about top five cases. Was that</p> <p>12 verbally or in writing?</p> <p>13 A. That was verbally.</p> <p>14 Q. And do you recall if Coleen Dugan was</p> <p>15 also present at that time?</p> <p>16 A. Yes.</p> <p>17 Q. She was?</p> <p>18 A. Yes.</p> <p>19 Q. Prior to that conversation with</p> <p>20 Lieutenant Cesario, had you ever heard anyone</p> <p>21 in the unit talk about any differences in the types</p> <p>22 of cases that should be assigned to task force</p> <p>23 officers and non-task force officers?</p> <p>24 A. Prior to June of 2012?</p>

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<p style="text-align: right;">21</p> <p>1 Q. Correct.</p> <p>2 A. No.</p> <p>3 Q. Okay. When did you first meet</p> <p>4 Shannon Spalding or Dan Echeverria?</p> <p>5 A. March of 2012.</p> <p>6 Q. Was that when they joined the Fugitive</p> <p>7 Apprehension Unit?</p> <p>8 A. Yes.</p> <p>9 Q. You did not know either of them before</p> <p>10 that?</p> <p>11 A. No.</p> <p>12 Q. And are you aware that Officers Spalding</p> <p>13 and Echeverria were not task force officers,</p> <p>14 correct?</p> <p>15 A. Yes, I was aware of that.</p> <p>16 Q. Other than Shannon Spalding or</p> <p>17 Dan Echeverria, do you ever recall other officers</p> <p>18 that complained about the types of assignments</p> <p>19 they got?</p> <p>20 MR. TAREN: Objection.</p> <p>21 BY THE WITNESS:</p> <p>22 A. No.</p> <p>23 BY MR. KING:</p> <p>24 Q. You have no recollection of anyone ever</p>	<p style="text-align: right;">23</p> <p>1 you sent a top five case to a non-task force</p> <p>2 officer that needs to get reassigned to a task</p> <p>3 force officer?</p> <p>4 A. Yes.</p> <p>5 Q. And did that happen fairly frequently?</p> <p>6 A. I wouldn't say frequently.</p> <p>7 Q. From time to time?</p> <p>8 A. Yes.</p> <p>9 Q. And that would happen from time to time</p> <p>10 not in connection with Shannon Spalding or Dan</p> <p>11 Echeverria, correct?</p> <p>12 A. Yes.</p> <p>13 MR. TAREN: Objection.</p> <p>14 BY MR. KING:</p> <p>15 Q. And what you testified to a few minutes</p> <p>16 ago where sergeants may direct you to reassign from</p> <p>17 the north side to the south side, you said that</p> <p>18 happened with respect to officers other than</p> <p>19 Shannon Spalding and Dan Echeverria, correct?</p> <p>20 MR. TAREN: Objection; foundation.</p> <p>21 BY MR. KING:</p> <p>22 Q. Correct?</p> <p>23 A. Could you make that statement again,</p> <p>24 please?</p>
<p style="text-align: right;">22</p> <p>1 complaining or questioning an assignment that they</p> <p>2 received?</p> <p>3 A. No.</p> <p>4 Q. So let's talk about -- strike that.</p> <p>5 So you don't recall, for example, anyone</p> <p>6 ever complaining, hey, I'm on the north side team,</p> <p>7 you're giving me a south side assignment, anything</p> <p>8 like that?</p> <p>9 A. Not directly from an officer.</p> <p>10 Q. Okay. Would you hear that from a</p> <p>11 sergeant, for example?</p> <p>12 A. Yes.</p> <p>13 Q. So you might send out an assignment, for</p> <p>14 example, the offender's on the south side but it</p> <p>15 goes to a north side team, the sergeant on the</p> <p>16 north side team may say, hey, you know, we should</p> <p>17 reassign this, that kind of thing, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And that's fairly common, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Once you were advised that certain kinds</p> <p>22 of assignments should go to task force officers and</p> <p>23 non-task force officers, do you ever remember</p> <p>24 sergeants or others similarly telling you, hey,</p>	<p style="text-align: right;">24</p> <p>1 Q. Sure. You testified that there were</p> <p>2 occasions where sergeants would let you know that a</p> <p>3 case needs to be reassigned because, for example,</p> <p>4 it may have been assigned to the north side but the</p> <p>5 offender's on the south side and you said that</p> <p>6 would happen from time to time.</p> <p>7 My question is that would happen from</p> <p>8 time to time involving officers other than Shannon</p> <p>9 Spalding and Dan Echeverria, correct?</p> <p>10 MR. TAREN: Same objection.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 BY MR. KING:</p> <p>14 Q. Thank you.</p> <p>15 Did you ever hear officers or sergeants</p> <p>16 or others letting you know that after you'd made an</p> <p>17 assignment of a particular offender that they</p> <p>18 discovered that that person had already been taken</p> <p>19 into custody?</p> <p>20 A. Yes.</p> <p>21 Q. And that would happen fairly frequently,</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. And that would happen with respect to</p>

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<p style="text-align: right;">25</p> <p>1 officers other than Shannon Spalding and Dan</p> <p>2 Echeverria, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And do you recall circumstances where</p> <p>5 you would make an assignment of a particular</p> <p>6 suspect and then you'd be told either by an</p> <p>7 officer or a sergeant or someone above that some</p> <p>8 other officers or another team were already</p> <p>9 working on that, that fugitive?</p> <p>10 A. Yes.</p> <p>11 Q. And that would happen fairly often?</p> <p>12 A. No.</p> <p>13 Q. From time to time?</p> <p>14 A. Yes.</p> <p>15 Q. And from time to time that would happen</p> <p>16 with respect to officers other than Spalding and</p> <p>17 Echeverria, correct?</p> <p>18 A. Yes.</p> <p>19 Q. So why don't you explain the assignment</p> <p>20 process once you and Coleen created the database</p> <p>21 and you sort of had the new system in place? How</p> <p>22 did that work and what was your responsibility in</p> <p>23 issuing the assignments?</p> <p>24 A. When the database was first started,</p>	<p style="text-align: right;">27</p> <p>1 informed to assign the top five cases to TFOs, we</p> <p>2 attempted to do that and the remainder would go</p> <p>3 to officers who were not TFOs.</p> <p>4 Q. So your process would be you first</p> <p>5 looked for the top five cases and make sure those</p> <p>6 are assigned to TFOs and then the remaining cases</p> <p>7 you just do it by area where the offender was</p> <p>8 located, is that fair?</p> <p>9 MR. TAREN: Objection just as to time frame.</p> <p>10 You're focusing only on after June of 2012,</p> <p>11 correct?</p> <p>12 MR. KING: Right now I am, yes.</p> <p>13 BY MR. KING:</p> <p>14 Q. And I don't want to put words in your</p> <p>15 mouth. I just want to really understand the</p> <p>16 process. For example, do you get an email with a</p> <p>17 list of cases? How do you learn about cases to</p> <p>18 then distribute? What's the process --</p> <p>19 MR. TAREN: I'm just going to --</p> <p>20 BY MR. KING:</p> <p>21 Q. -- on or after June of 2012?</p> <p>22 MR. TAREN: Okay.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Every morning when we came in we would</p>
<p style="text-align: right;">26</p> <p>1 there were four administrative assistants in the</p> <p>2 office and one handled north, one handled south,</p> <p>3 one handled central, and the other administrative</p> <p>4 assistant handled all the other administrative</p> <p>5 work.</p> <p>6 Q. Can you tell me who was responsible for</p> <p>7 each of those areas?</p> <p>8 A. They switched periodically.</p> <p>9 Q. Okay.</p> <p>10 A. At one point I was in charge of north.</p> <p>11 At one point I was in charge of south. And at</p> <p>12 another point I was in charge of central. I could</p> <p>13 not give you dates on that.</p> <p>14 Q. Okay. And then would you send out</p> <p>15 emails of the assignments? Or just explain to</p> <p>16 me sort of how the process worked.</p> <p>17 A. Yes. We would send out emails to the</p> <p>18 officers and to the team and list the jobs and</p> <p>19 who -- what officer was assigned to what case.</p> <p>20 Q. And how did you make those</p> <p>21 determinations or make those lists? What was the</p> <p>22 process to figure out who would be assigned which</p> <p>23 case?</p> <p>24 A. Well, after June of 2012 when we were</p>	<p style="text-align: right;">28</p> <p>1 have to pull the list of warrants, new warrants</p> <p>2 that had been issued for offenders that were</p> <p>3 wanted. And based on that we would determine the</p> <p>4 location of where the offender lived. And from</p> <p>5 there we would make the proper assignments.</p> <p>6 Now, if we had, let's say, ten high</p> <p>7 top five cases, obviously we couldn't give top five</p> <p>8 cases to all TFOs. So we would have to give some</p> <p>9 of the top five cases to other officers other than</p> <p>10 TFOs.</p> <p>11 BY MR. KING:</p> <p>12 Q. Okay. Would you say that was common or</p> <p>13 an infrequent situation where you'd have to give a</p> <p>14 top five case to a non-TFO?</p> <p>15 A. Frequent.</p> <p>16 Q. Okay. And prior to June of 2012 when</p> <p>17 you were instructed to give top five cases to task</p> <p>18 force officers, was the process of assigning cases</p> <p>19 the same as it was beginning in June, 2012? In</p> <p>20 other words, was the only difference in June, 2012,</p> <p>21 the fact that you were now assigning top five cases</p> <p>22 to task force officers?</p> <p>23 A. Yes. To the best of my recollection,</p> <p>24 there was no understanding that TFOs -- from the</p>

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<p style="text-align: right;">29</p> <p>1 time I arrived at the unit and started the database</p> <p>2 until June of 2012, there was no direction as to</p> <p>3 what officers got what cases.</p> <p>4 Q. Let me ask it another way. With respect</p> <p>5 to the assignment process and what officers got</p> <p>6 what cases, was the only thing that changed in</p> <p>7 June, 2012, as compared to before that was that you</p> <p>8 were now trying to assign top five cases to task</p> <p>9 force officers, is that fair to say?</p> <p>10 A. Yes, trying.</p> <p>11 Q. And when we talk about top five cases,</p> <p>12 do you recall what kinds of cases those were in</p> <p>13 particular?</p> <p>14 A. Homicides, armed robberies.</p> <p>15 Q. Sexual assault?</p> <p>16 A. Yes.</p> <p>17 Q. Do you remember any others?</p> <p>18 A. I don't.</p> <p>19 Q. Burglaries, do you recall?</p> <p>20 A. I don't recall burglaries being a top</p> <p>21 five.</p> <p>22 Q. Aggravated battery?</p> <p>23 A. Absolutely.</p> <p>24 Q. Parole violations, do you recall that</p>	<p style="text-align: right;">31</p> <p>1 A. My responsibilities was to receive the</p> <p>2 overtime slips from all of the officers who were</p> <p>3 eligible to participate in this new program and to</p> <p>4 create a database based on seniority for which</p> <p>5 days the officer put in to work certain weekends,</p> <p>6 Saturdays or Sundays, and it was based on</p> <p>7 seniority.</p> <p>8 Q. Okay. And who instructed you in how to</p> <p>9 do that?</p> <p>10 A. Lieutenant Cesario.</p> <p>11 Q. So if multiple officers put in a request</p> <p>12 to work overtime on a particular weekend, that</p> <p>13 decision of who gets approved is supposed to be by</p> <p>14 seniority?</p> <p>15 A. Yes.</p> <p>16 Q. And was there ever a change in that</p> <p>17 system on how officers were to make their requests</p> <p>18 for VRI?</p> <p>19 A. Yes.</p> <p>20 Q. And when did that change, if you can</p> <p>21 recall?</p> <p>22 A. November, 2012.</p> <p>23 Q. And what was the change that happened in</p> <p>24 November, 2012?</p>
<p style="text-align: right;">30</p> <p>1 being one of them?</p> <p>2 A. No.</p> <p>3 Q. Violations of probation, was that one of</p> <p>4 them?</p> <p>5 A. No.</p> <p>6 Q. I think you've given me four. I'm not</p> <p>7 sure if there were only five or they just called it</p> <p>8 top five. But can you recall any other types of</p> <p>9 cases that were in the top five cases?</p> <p>10 A. I believe the other one was criminal</p> <p>11 sexual -- sex cases.</p> <p>12 Q. You had mentioned sexual assault. Are</p> <p>13 you saying something different than that in terms</p> <p>14 of sex cases?</p> <p>15 A. No, I'm meaning the same thing.</p> <p>16 Q. Okay. That's fine.</p> <p>17 During your time in the Fugitive</p> <p>18 Apprehension Unit, were you familiar with the</p> <p>19 VRI overtime program?</p> <p>20 A. Yes.</p> <p>21 Q. And did you have any responsibilities</p> <p>22 relating to the VRI?</p> <p>23 A. Yes.</p> <p>24 Q. What were your responsibilities?</p>	<p style="text-align: right;">32</p> <p>1 A. I informed Lieutenant Cesario that I did</p> <p>2 not feel comfortable with the process that we had</p> <p>3 currently had in place, which was the officers</p> <p>4 would just hand me their overtime slips. So there</p> <p>5 would be no record of dates and times and there</p> <p>6 was an end period when you had to have forms</p> <p>7 submitted by a certain deadline.</p> <p>8 Q. Sure.</p> <p>9 A. So I informed him I was not comfortable</p> <p>10 with that practice. And I developed a new form and</p> <p>11 sent out an email to all participants that the</p> <p>12 process had changed and from now on you will have</p> <p>13 to email me your request by the deadline so that</p> <p>14 way I would have an electronic.</p> <p>15 Q. Sure. And when you told</p> <p>16 Lieutenant Cesario you weren't comfortable with the</p> <p>17 existing process, was that a face-to-face verbal</p> <p>18 conversation?</p> <p>19 A. I believe so.</p> <p>20 Q. Do you recall if Coleen Dugan was also</p> <p>21 present during that conversation?</p> <p>22 A. No.</p> <p>23 Q. You're not sure or you don't think she</p> <p>24 was?</p>

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<p style="text-align: right;">33</p> <p>1 A. I'm not sure.</p> <p>2 Q. Okay. And other than what you've</p> <p>3 already testified to in terms of what you said to</p> <p>4 Lieutenant Cesario in that conversation about</p> <p>5 changing the practice around VRI, do you recall</p> <p>6 anything else you said to Lieutenant Cesario or</p> <p>7 that he said to you in that conversation?</p> <p>8 MR. TAREN: Objection; assumes it's just one</p> <p>9 conversation.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Are you referring to the conversation</p> <p>12 when I told him I didn't feel comfortable with the</p> <p>13 current practice?</p> <p>14 BY MR. KING:</p> <p>15 Q. Yes, that you just testified to. And my</p> <p>16 question is other than what you've already</p> <p>17 testified to in that conversation, was there</p> <p>18 anything else said by you or by Lieutenant Cesario?</p> <p>19 A. I don't believe so.</p> <p>20 Q. Do you recall any prior conversations</p> <p>21 between yourself and Lieutenant Cesario about the</p> <p>22 way VRI was handled?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And how many prior conversations</p>	<p style="text-align: right;">35</p> <p>1 A. Initially the conversation between him</p> <p>2 and I was how we were going to proceed with the</p> <p>3 new -- it was a new overtime procedure. We had</p> <p>4 never had that in the unit. So the City allowed</p> <p>5 us to participate in this violence reduction</p> <p>6 initiation. So initially it was conversation about</p> <p>7 how we were going to go about doing things. And it</p> <p>8 was going to be based on seniority and this is the</p> <p>9 form they're going to fill out. There's going to</p> <p>10 be a deadline so that you can create your database.</p> <p>11 And I was the only one in charge of VRI. So that</p> <p>12 was one of the conversations.</p> <p>13 Q. Okay.</p> <p>14 A. Another conversation would be about</p> <p>15 all of the cancellations. Officers would call the</p> <p>16 day they were scheduled and they would cancel. And</p> <p>17 the sergeants that were working that day did not</p> <p>18 have access to my database so they didn't know</p> <p>19 what officer was next in seniority to get the</p> <p>20 replacement. So they would just call anyone.</p> <p>21 That's was another issue, at which time the</p> <p>22 lieutenant put out an order about cancellations</p> <p>23 and, you know, you get a strike against you.</p> <p>24 Q. Sure. Not to interrupt you, but do you</p>
<p style="text-align: right;">34</p> <p>1 did you have?</p> <p>2 A. Many.</p> <p>3 Q. And can you remember a particular</p> <p>4 conversation, how many you had or --</p> <p>5 A. Approximately five.</p> <p>6 Q. Okay. And was the subject matter of</p> <p>7 this approximately five conversations the same? In</p> <p>8 other words, it sounds like you're saying you had</p> <p>9 conversations with him about the way VRI was</p> <p>10 handled. In all of those conversations were they</p> <p>11 essentially the same or different topics?</p> <p>12 A. They were different topics.</p> <p>13 Q. Any recollection of when the first</p> <p>14 conversation you had with Lieutenant Cesario</p> <p>15 around VRI was?</p> <p>16 A. June or July of 2012.</p> <p>17 Q. And do you recall was that an in-person</p> <p>18 face-to-face conversation?</p> <p>19 A. Yes.</p> <p>20 Q. And was anyone else present?</p> <p>21 A. Not to my knowledge.</p> <p>22 Q. What do you recall being said either by</p> <p>23 you or Lieutenant Cesario in that June or July,</p> <p>24 2012 conversation?</p>	<p style="text-align: right;">36</p> <p>1 ever recall Spalding or Echeverria being scheduled</p> <p>2 to work overtime and then either of them canceling?</p> <p>3 A. No.</p> <p>4 Q. What other conversations did you have</p> <p>5 with Lieutenant Cesario around VRI?</p> <p>6 A. I was instructed by Lieutenant Cesario</p> <p>7 to act as if I didn't receive Officers Spalding and</p> <p>8 Echeverria's requests and to toss them in the</p> <p>9 garbage.</p> <p>10 Q. Were those his exact words?</p> <p>11 A. Not verbatim.</p> <p>12 Q. Okay. Did he say toss them in the</p> <p>13 garbage?</p> <p>14 A. Throw them out, toss them in the</p> <p>15 garbage.</p> <p>16 Q. Is it fair to say you don't remember the</p> <p>17 exact words that Lieutenant Cesario allegedly used</p> <p>18 in this conversation?</p> <p>19 MR. TAREN: Objection.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Yes.</p> <p>22 BY MR. KING:</p> <p>23 Q. Okay. Was anyone else present during</p> <p>24 this conversation that you just testified to with</p>

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<p style="text-align: right;">37</p> <p>1 Lieutenant Cesario?</p> <p>2 A. No.</p> <p>3 Q. Where did that conversation take place?</p> <p>4 A. Harrison and Kedzie in his office.</p> <p>5 Q. And since you told me that the first</p> <p>6 conversation about VRI was in June or July of 2012</p> <p>7 and you told me about some other conversations</p> <p>8 about cancellations and the like, I'm assuming that</p> <p>9 this conversation where Lieutenant Cesario</p> <p>10 allegedly told you act like you didn't receive</p> <p>11 their overtime requests, something along the lines</p> <p>12 of throw them in the garbage, I'm assuming that</p> <p>13 that happened after July of 2012, would that be</p> <p>14 correct?</p> <p>15 A. No. I believe that happened at the very</p> <p>16 beginning of the program.</p> <p>17 Q. The very beginning of the program. What</p> <p>18 do you mean by that? What time period would that</p> <p>19 have been?</p> <p>20 A. June or July of 2012.</p> <p>21 Q. And was that conversation before or</p> <p>22 after the system changed, if you will, where people</p> <p>23 had to email their overtime requests?</p> <p>24 A. That was before.</p>	<p style="text-align: right;">39</p> <p>1 A. No.</p> <p>2 Q. You would agree that Spalding and</p> <p>3 Echeverria did work some overtime pursuant to the</p> <p>4 VRI program, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Is it your testimony there were</p> <p>7 occasions where they put in for overtime and they</p> <p>8 were not allowed to work overtime for some reason</p> <p>9 other than their seniority?</p> <p>10 A. Yes.</p> <p>11 Q. Any idea how many times that occurred?</p> <p>12 A. I'm going to say at least two months,</p> <p>13 but I believe it was more than two months the</p> <p>14 practice continued where I had to -- I was</p> <p>15 instructed by Lieutenant Cesario to throw their</p> <p>16 sheets away.</p> <p>17 Q. So you think that practice continued</p> <p>18 where you were essentially throwing their sheets</p> <p>19 away for two or three months after June or July</p> <p>20 of 2012?</p> <p>21 A. Yes.</p> <p>22 Q. And when we talk about months, were</p> <p>23 there VRI overtime opportunities every single</p> <p>24 weekend or once a month or how did that work?</p>
<p style="text-align: right;">38</p> <p>1 Q. And when Lieutenant Cesario told you</p> <p>2 in effect to disregard Spalding and Echeverria's</p> <p>3 overtime request, did you say anything to him?</p> <p>4 A. I asked him why.</p> <p>5 Q. And did he respond to you?</p> <p>6 A. He gave me a direct order.</p> <p>7 Q. Did he respond to you when you asked him</p> <p>8 why? What did he say?</p> <p>9 A. Yes. He said I'm giving you a direct</p> <p>10 order to throw their sheets out, their slips out,</p> <p>11 and do not put them on the schedule.</p> <p>12 Q. Okay. And was there anything else said</p> <p>13 in that conversation by you or Lieutenant Cesario?</p> <p>14 A. Not to my knowledge.</p> <p>15 Q. And where did this conversation take</p> <p>16 place?</p> <p>17 A. In Lieutenant Cesario's office.</p> <p>18 Q. Do you know if the door was open or</p> <p>19 closed?</p> <p>20 A. Closed.</p> <p>21 Q. Other than that conversation, did you</p> <p>22 have any subsequent conversations with Lieutenant</p> <p>23 Cesario about the subject of disregarding overtime</p> <p>24 requests from Spalding or Echeverria?</p>	<p style="text-align: right;">40</p> <p>1 A. Every single weekend.</p> <p>2 Q. And do you have any recollection of</p> <p>3 how many times Spalding or Echeverria requested</p> <p>4 overtime and you disregarded them and threw them in</p> <p>5 the trash or otherwise disregarded them?</p> <p>6 A. I do not recall exactly how many times,</p> <p>7 but to the best of my knowledge it was two to five</p> <p>8 times.</p> <p>9 Q. And is it your testimony that in those</p> <p>10 two to five times they did not work the overtime?</p> <p>11 A. Correct.</p> <p>12 Q. At any point before that practice</p> <p>13 stopped, I guess, did you speak with Shannon</p> <p>14 Spalding or Dan Echeverria and tell them that</p> <p>15 you had been instructed to reject their overtime</p> <p>16 requests?</p> <p>17 A. No.</p> <p>18 Q. Did they ever come to you, Spalding or</p> <p>19 Echeverria, during this period and ask you, hey, I</p> <p>20 put in for VRI overtime, how come I didn't get it?</p> <p>21 Were there any conversations like that with you?</p> <p>22 A. I believe so.</p> <p>23 Q. You believe so. Do you recall a</p> <p>24 specific conversation with Spalding or Echeverria</p>

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<p style="text-align: right;">41</p> <p>1 where they questioned you about why their request</p> <p>2 for VRI overtime was not received or approved?</p> <p>3 A. Yes, I'm sure there was a conversation.</p> <p>4 Q. Do you recall -- you seem a little</p> <p>5 uncertain about that. Are you thinking that there</p> <p>6 probably was a conversation or do you recall an</p> <p>7 actual conversation?</p> <p>8 A. I'm thinking there probably was a</p> <p>9 conversation.</p> <p>10 Q. But you don't recall any actual</p> <p>11 conversations as you sit here today, correct?</p> <p>12 A. No.</p> <p>13 Q. Do you have any knowledge of how many</p> <p>14 days of overtime Spalding or Echeverria did work</p> <p>15 in the Fugitive Apprehension Unit?</p> <p>16 A. I would have no idea.</p> <p>17 MR. KING: Mark it as 1.</p> <p>18 (WHEREUPON, a certain document was</p> <p>19 marked Hanna Deposition Exhibit</p> <p>20 No. 1, for identification, as of</p> <p>21 08-12-2015.)</p> <p>22 BY MR. KING:</p> <p>23 Q. Ms. Hanna, showing you what's been</p> <p>24 marked as Hanna Deposition Exhibit No. 1, which is</p>	<p style="text-align: right;">43</p> <p>1 Q. Okay. Did you read this affidavit</p> <p>2 before you signed it?</p> <p>3 A. I did.</p> <p>4 Q. Do you recall why or how you missed that</p> <p>5 the first time?</p> <p>6 A. No, I don't.</p> <p>7 Q. Who initially contacted you about</p> <p>8 potentially giving an affidavit in connection</p> <p>9 with this litigation?</p> <p>10 MR. TAREN: Objection; assumes matters.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I contacted the attorney Chris that was</p> <p>13 representing Danny and Shannon.</p> <p>14 BY MR. KING:</p> <p>15 Q. Christopher Smith?</p> <p>16 A. Yes.</p> <p>17 Q. And did Shannon Spalding or Dan</p> <p>18 Echeverria ask you to contact Chris?</p> <p>19 A. No.</p> <p>20 Q. Did Shannon Spalding or Dan Echeverria</p> <p>21 ask you if you would consider signing an affidavit</p> <p>22 for them in connection with this case?</p> <p>23 A. No.</p> <p>24 Q. Where did you get Chris Smith's contact</p>
<p style="text-align: right;">42</p> <p>1 the affidavit of Janet Hanna, I assume you're</p> <p>2 familiar with this document?</p> <p>3 A. Yes, I am.</p> <p>4 Q. And you signed the document on the last</p> <p>5 page, correct?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And you understood that you were signing</p> <p>8 this document -- I'm sorry.</p> <p>9 You were representing and under</p> <p>10 penalties of perjury that the statements in this</p> <p>11 affidavit are true and correct? You understood</p> <p>12 that, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And is it your testimony that everything</p> <p>15 in this affidavit is true and correct?</p> <p>16 A. Yes.</p> <p>17 Excuse me. I do have one correction.</p> <p>18 Q. Okay. What is the correction?</p> <p>19 A. No. 13 on Page 2.</p> <p>20 Q. Okay.</p> <p>21 A. It says on or around June 25th, 2012, I</p> <p>22 was working overtime in the FAU in Homan Square and</p> <p>23 that is not correct. That should be at Harrison</p> <p>24 and Kedzie because we had already made the move.</p>	<p style="text-align: right;">44</p> <p>1 information?</p> <p>2 A. It was on the website available to</p> <p>3 pull up and read the entire document, the entire</p> <p>4 lawsuit.</p> <p>5 Q. Okay. I'm certain that it was.</p> <p>6 Is it your testimony that that's where</p> <p>7 you got Chris Smith's name, from the complaint that</p> <p>8 was on the Internet?</p> <p>9 A. I got it from the complaint that was on</p> <p>10 the Internet, as well as the news release.</p> <p>11 Q. Okay. And it's your testimony that</p> <p>12 without any conversation with Shannon Spalding or</p> <p>13 Danny Echeverria you took it upon yourself to</p> <p>14 call up Christopher Smith and offer to give an</p> <p>15 affidavit? Is that your testimony?</p> <p>16 A. Yes.</p> <p>17 Q. Since the lawsuit was filed by Spalding</p> <p>18 and Echeverria, have you had any conversations with</p> <p>19 Shannon Spalding or Dan Echeverria?</p> <p>20 A. Yes, I've had conversations.</p> <p>21 Q. Since you've gone out on medical leave,</p> <p>22 have you had any conversations with Shannon</p> <p>23 Spalding or Dan Echeverria?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">45</p> <p>1 Q. And have they related to this lawsuit?</p> <p>2 A. No.</p> <p>3 Q. Have they related to the subject of your</p> <p>4 affidavit in the lawsuit?</p> <p>5 A. No.</p> <p>6 Q. Why did you contact Mr. Smith?</p> <p>7 A. I was put on disability 20 September,</p> <p>8 2014, and at that time I knew that I was going to</p> <p>9 be on long-term disability and my doctors had told</p> <p>10 me that I would be permanently disabled. So I knew</p> <p>11 that I could come forward and break the code of</p> <p>12 silence without being retaliated against like</p> <p>13 Officer Echeverria and Spalding were.</p> <p>14 Q. I appreciate that that may be your</p> <p>15 opinion. You mentioned the code of silence.</p> <p>16 What's your understanding of what the code of</p> <p>17 silence is?</p> <p>18 A. When I was in the Police Academy, I was</p> <p>19 instructed by several instructors. We were told</p> <p>20 over and over again we do not break the code of</p> <p>21 silence. Blue is blue. You stick together. If</p> <p>22 something occurs on the street that you don't think</p> <p>23 is proper, you go with the flow. And after that</p> <p>24 situation, if you have an issue with that officer</p>	<p style="text-align: right;">47</p> <p>1 with Shannon Spalding about the subject of her</p> <p>2 recovering money from this lawsuit?</p> <p>3 A. No.</p> <p>4 Q. Let's look at Exhibit 1, which is your</p> <p>5 affidavit. Paragraph 2 says, for the record, in</p> <p>6 March of 2012, Lieutenant Cesario informed you and</p> <p>7 Coleen Dugan that two new officers were coming who</p> <p>8 were supposedly IAD rats and to be very leery of</p> <p>9 them.</p> <p>10 When did that conversation take place?</p> <p>11 A. March of 2012.</p> <p>12 Q. And was this prior to Spalding and</p> <p>13 Echeverria getting to the unit?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recall how many days prior to</p> <p>16 them coming to the unit that conversation took</p> <p>17 place?</p> <p>18 A. The day prior to them arriving.</p> <p>19 Q. Okay. And where did this conversation</p> <p>20 take place?</p> <p>21 A. Lieutenant Cesario's office at</p> <p>22 Homan Square.</p> <p>23 Q. And you and Lieutenant Cesario and</p> <p>24 Coleen Dugan were present, correct?</p>
<p style="text-align: right;">46</p> <p>1 or what happened, you can confront them. If you</p> <p>2 don't feel comfortable working with them anymore,</p> <p>3 you can go to the watch commander and request a new</p> <p>4 partner. But you never break the code of silence.</p> <p>5 Q. And are you saying this was part of the</p> <p>6 formal instruction at the Police Academy in courses</p> <p>7 that you took or was that informal conversation</p> <p>8 with people while you were in the Police Academy?</p> <p>9 A. It's well known in the Police Academy.</p> <p>10 Instructors do speak about it openly in classrooms.</p> <p>11 Q. Did you ever hear instructors openly</p> <p>12 speaking about the code of silence in the sense of</p> <p>13 not reporting the activities, for example, of other</p> <p>14 officers? Is it your testimony that instructors in</p> <p>15 the classroom in the Police Academy taught that?</p> <p>16 A. They spoke of that, yes.</p> <p>17 Q. Do you remember any particular</p> <p>18 instructors that you had at the Police Academy</p> <p>19 that spoke of that?</p> <p>20 A. I do not.</p> <p>21 Q. Did anyone offer you anything in</p> <p>22 exchange for signing your affidavit?</p> <p>23 A. No.</p> <p>24 Q. Have you ever had a conversation</p>	<p style="text-align: right;">48</p> <p>1 A. Yes.</p> <p>2 Q. And tell me, if you would, everything</p> <p>3 that Lieutenant Cesario said and that you or Coleen</p> <p>4 Dugan said in that conversation.</p> <p>5 A. Pretty much we were speechless and just</p> <p>6 said okay.</p> <p>7 Q. Are you aware that Coleen Dugan has</p> <p>8 given a deposition in this case?</p> <p>9 A. No.</p> <p>10 Q. Then I assume you're not aware that</p> <p>11 Coleen Dugan has testified under oath that she</p> <p>12 never heard Robert Cesario ever refer to the</p> <p>13 plaintiffs as rats? I assume you're unaware of</p> <p>14 that?</p> <p>15 A. I am unaware.</p> <p>16 Q. And if that testimony is what Coleen</p> <p>17 Dugan testified to, is it your testimony that</p> <p>18 Coleen is lying?</p> <p>19 A. Absolutely.</p> <p>20 Q. And then I assume you're also unaware</p> <p>21 that Coleen Dugan testified under oath in this case</p> <p>22 that you, in fact, were the person that referred to</p> <p>23 Shannon Spalding and Danny Echeverria as having</p> <p>24 come from IAD? Are you unaware of that?</p>

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<p style="text-align: right;">49</p> <p>1 A. How did she refer to me? How did she</p> <p>2 refer to that?</p> <p>3 Q. Are you aware of whether she testified</p> <p>4 that you were the first person to tell her that</p> <p>5 Spalding and Echeverria had come from IAD?</p> <p>6 MR. TAREN: I'm going to object and I'll</p> <p>7 object to the line of questioning. She already</p> <p>8 testified she wasn't aware that Ms. Dugan gave a</p> <p>9 deposition.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Yes, I'm unaware.</p> <p>12 BY MR. KING:</p> <p>13 Q. Okay. Is it true that you told</p> <p>14 Coleen Dugan that you believed Spalding and</p> <p>15 Echeverria were coming from IAD prior to the</p> <p>16 time they arrived?</p> <p>17 A. No.</p> <p>18 Q. If Coleen Dugan testified that you told</p> <p>19 her that, is it your testimony that she would be</p> <p>20 lying?</p> <p>21 A. Absolutely.</p> <p>22 Q. So Paragraph 4 of your affidavit</p> <p>23 indicates that the day Shannon and Danny started,</p> <p>24 Cesario walked them over to you. He walked away.</p>	<p style="text-align: right;">51</p> <p>1 he walked away, Lieutenant Cesario, those were the</p> <p>2 first words I uttered out of my mouth to both</p> <p>3 officers.</p> <p>4 Q. And did anybody respond to what you were</p> <p>5 saying then?</p> <p>6 A. Yes.</p> <p>7 Q. Who did?</p> <p>8 A. Shannon.</p> <p>9 Q. What did Shannon say?</p> <p>10 A. Yes. I have Gary's phone number right</p> <p>11 on my cellphone. I'll give him a call right now.</p> <p>12 Q. Okay. What did you understand that to</p> <p>13 mean?</p> <p>14 A. That she was personal friends with the</p> <p>15 superintendent.</p> <p>16 Q. Do you remember you or her or Danny or</p> <p>17 Coleen saying anything else in that conversation?</p> <p>18 A. No.</p> <p>19 Q. Okay. Paragraph 7 of the affidavit</p> <p>20 talks about Cesario ordering you to give Danny and</p> <p>21 Shannon only dead-end cases that would not lead to</p> <p>22 an arrest or officer activity.</p> <p>23 Is Paragraph 7 a reference to the</p> <p>24 conversation you had with Cesario that you've</p>
<p style="text-align: right;">50</p> <p>1 And then you said to Shannon and Danny, so you two</p> <p>2 are the IAD rats. Is that your testimony that that</p> <p>3 conversation took place?</p> <p>4 A. Yes.</p> <p>5 Q. And you say Lieutenant Cesario had</p> <p>6 walked away. Do you know whether he heard you say</p> <p>7 so you two are the IAD rats?</p> <p>8 MR. TAREN: Objection.</p> <p>9 BY MR. KING:</p> <p>10 Q. If you know whether Cesario was still</p> <p>11 present and heard you say that.</p> <p>12 MR. TAREN: Same objection.</p> <p>13 BY THE WITNESS:</p> <p>14 A. He was not present and I do not know if</p> <p>15 he heard that.</p> <p>16 BY MR. KING:</p> <p>17 Q. And were these the first words you</p> <p>18 uttered when you met Shannon and Danny for the</p> <p>19 first time, so you two are the IAD rats?</p> <p>20 A. Yes. I was introduced to them by</p> <p>21 Lieutenant Cesario. Coleen Dugan and I sat</p> <p>22 directly across from each other at the same desk.</p> <p>23 We were introduced to them at the exact same time.</p> <p>24 We shook hands, nice to meet you. And as soon as</p>	<p style="text-align: right;">52</p> <p>1 already testified to in this deposition?</p> <p>2 MR. TAREN: Objection.</p> <p>3 MR. KING: We have --</p> <p>4 MR. TAREN: She hasn't been questioned about</p> <p>5 that conversation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I was only questioned about VRI and</p> <p>8 assigning cases to Shannon and Danny for VRI.</p> <p>9 BY MR. KING:</p> <p>10 Q. Well, let's talk about Paragraph 7. The</p> <p>11 record will speak for itself.</p> <p>12 When did this conversation take place,</p> <p>13 this alleged conversation when Lieutenant Cesario</p> <p>14 ordered you to give them only dead-end cases that</p> <p>15 would not lead to arrests or officer activity?</p> <p>16 A. Very soon after they arrived to the</p> <p>17 unit.</p> <p>18 Q. Was this a conversation where just you</p> <p>19 and Lieutenant Cesario were present?</p> <p>20 A. I don't believe so.</p> <p>21 Q. Do you recall anyone else being present?</p> <p>22 A. Coleen Dugan and myself.</p> <p>23 Q. Do you recall where this conversation</p> <p>24 took place?</p>

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<p style="text-align: right;">53</p> <p>1 A. In Lieutenant Cesario's office at</p> <p>2 Homan Square.</p> <p>3 Q. And what specifically do you recall</p> <p>4 Lieutenant Cesario saying and what did you or</p> <p>5 Coleen Dugan say in that conversation?</p> <p>6 A. Lieutenant Cesario instructed us to give</p> <p>7 them all dead-end cases, garbage cases, drinking on</p> <p>8 the public way, you know, ridiculous, you know,</p> <p>9 cases. And obviously when he made that statement,</p> <p>10 myself and Coleen Dugan knew where he was going</p> <p>11 with that after he had told us that they were</p> <p>12 from IAD.</p> <p>13 Q. What was your understanding of where he</p> <p>14 was going with that?</p> <p>15 A. You don't want to give them any high</p> <p>16 profile cases. You don't want to give them work.</p> <p>17 You know, they're just here to take up space.</p> <p>18 Q. That was your interpretation of what he</p> <p>19 said?</p> <p>20 A. That was my interpretation.</p> <p>21 Q. And I would like you to tell me as best</p> <p>22 as you can recall his exact words. Did he say</p> <p>23 garbage cases? Did he say drinking on the public</p> <p>24 way? Or is this your interpretation? For now I</p>	<p style="text-align: right;">55</p> <p>1 of what, if anything, you or Coleen Dugan said in</p> <p>2 that conversation?</p> <p>3 A. I do not.</p> <p>4 Q. And did you or Coleen to your knowledge</p> <p>5 as the assigners of work, did you do anything to</p> <p>6 carry out this alleged directive from Cesario?</p> <p>7 A. Absolutely.</p> <p>8 Q. So you would screen the cases and look</p> <p>9 for dead-end cases and then you'd send those</p> <p>10 to Danny and Shannon, is that your testimony?</p> <p>11 A. And the lieutenant had to be copied on</p> <p>12 it, as well as the commander.</p> <p>13 Q. Okay.</p> <p>14 A. And their sergeant.</p> <p>15 Q. And what were the types of cases that</p> <p>16 you were looking for when you were following</p> <p>17 Lieutenant Cesario's instruction in sending them</p> <p>18 to Danny and Shannon?</p> <p>19 A. As I said prior, drinking on the public</p> <p>20 way, juvenile warrants, jumping a turnstile, minor</p> <p>21 offenses.</p> <p>22 Q. And from the date of that conversation,</p> <p>23 whenever that was, until what period of time did</p> <p>24 that end when you stopped screening their cases</p>
<p style="text-align: right;">54</p> <p>1 just want to know the words that came out of</p> <p>2 Lieutenant Cesario's mouth in that conversation.</p> <p>3 MR. TAREN: Objection; asked and answered.</p> <p>4 BY MR. KING:</p> <p>5 Q. What did he say specifically in</p> <p>6 this conversation with you and Coleen Dugan?</p> <p>7 A. To the best of my knowledge, it was give</p> <p>8 them dead-end cases, such as drinking on the public</p> <p>9 way, juvenile warrants. That's it.</p> <p>10 Q. Do you recall him saying anything else</p> <p>11 in that conversation?</p> <p>12 A. No.</p> <p>13 Q. And did you or Coleen Dugan say anything</p> <p>14 in that conversation?</p> <p>15 A. I'm sure we agreed.</p> <p>16 Q. Do you recall you or Coleen saying</p> <p>17 anything in that conversation with Lieutenant</p> <p>18 Cesario?</p> <p>19 A. Well, I would have to say that I</p> <p>20 acknowledged the lieutenant and said yes or okay.</p> <p>21 Q. Do you recall doing that or are you</p> <p>22 assuming that that's what you did?</p> <p>23 A. I'm assuming that's what I did.</p> <p>24 Q. You don't have a specific recollection</p>	<p style="text-align: right;">56</p> <p>1 for dead-end cases? Do you know when that practice</p> <p>2 stopped?</p> <p>3 A. Never, not as long as I was there.</p> <p>4 Q. Okay. So is it your testimony that you</p> <p>5 believe Spalding and Echeverria the entire time</p> <p>6 that you were in the unit got only dead-end cases,</p> <p>7 such as jumping turnstiles, drinking on the public</p> <p>8 way? Is that your testimony?</p> <p>9 MR. TAREN: Objection; assumes matters not</p> <p>10 testified to.</p> <p>11 BY THE WITNESS:</p> <p>12 A. That would not be my testimony because I</p> <p>13 know, in fact, that I inadvertently assigned them a</p> <p>14 homicide case and I was reprimanded for that. And</p> <p>15 the case was taken away by their sergeant.</p> <p>16 BY MR. KING:</p> <p>17 Q. We'll talk about that.</p> <p>18 Other than the one homicide case you</p> <p>19 assigned them, is it your testimony that the entire</p> <p>20 time that Shannon Spalding, Danny Echeverria, and</p> <p>21 you worked in the Fugitive Apprehension Unit other</p> <p>22 than the one homicide was that they received only</p> <p>23 what you considered dead-end cases? Is that your</p> <p>24 testimony?</p>

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<p style="text-align: right;">57</p> <p>1 MR. TAREN: Objection. It mischaracterizes</p> <p>2 her testimony.</p> <p>3 BY THE WITNESS:</p> <p>4 A. No, I can't make that statement because</p> <p>5 when they were switched from team to team and teams</p> <p>6 were sent to different officers in the office, I</p> <p>7 don't know what the other officers were doing. I</p> <p>8 only know that when I was assigned to a team that</p> <p>9 they were assigned to that is what I did because I</p> <p>10 was instructed to do that.</p> <p>11 BY MR. KING:</p> <p>12 Q. Okay. What team were you on -- what</p> <p>13 team were they on when you were responsible for</p> <p>14 their assignments? Was that Sergeant Barnes' team</p> <p>15 or Sergeant Mills' team or both?</p> <p>16 A. Sergeant Barnes.</p> <p>17 Q. So you have no knowledge of what types</p> <p>18 of assignments or what the assignment process was</p> <p>19 for them after they had been moved to Sergeant</p> <p>20 Mills' team, correct?</p> <p>21 A. No. I know that it was -- everyone in</p> <p>22 the office had knowledge of that and everyone</p> <p>23 participated in that.</p> <p>24 Q. All right. I asked you when it ended</p>	<p style="text-align: right;">59</p> <p>1 aware of them? In other words, you didn't pick the</p> <p>2 dead-end cases and then go to Salemme or Barnes or</p> <p>3 Cesario and say I'm only going to send them these?</p> <p>4 You knew which dead-end cases to select and then</p> <p>5 you would send an email and then they would be</p> <p>6 copied on it, correct?</p> <p>7 MR. KING: Objection. First of all, there's</p> <p>8 about five questions in there and it assumes</p> <p>9 matters that have not been testified to.</p> <p>10 BY MR. KING:</p> <p>11 Q. Did you understand my question?</p> <p>12 A. Could you rephrase it, please?</p> <p>13 Q. Yeah, yeah. After you were given this</p> <p>14 directive by Cesario and you would send the</p> <p>15 assignments to Spalding and Echeverria that were</p> <p>16 so-called dead-end assignments, the way that</p> <p>17 Commander Salemme and Sergeant Barnes and</p> <p>18 Lieutenant Cesario would know about those specific</p> <p>19 case assignments is because they were copied on the</p> <p>20 emails, correct?</p> <p>21 A. No.</p> <p>22 Q. Did you have a practice of before you</p> <p>23 sent an email with an assignment going to either</p> <p>24 Commander Salemme, Lieutenant Cesario, or</p>
<p style="text-align: right;">58</p> <p>1 that they were only assigned dead-end cases and</p> <p>2 you testified it never ended. It continued the</p> <p>3 whole time you were there. So then my question to</p> <p>4 you was is it your testimony that the entire time</p> <p>5 Spalding and Echeverria and you were together in</p> <p>6 the Fugitive Apprehension Unit -- is it your</p> <p>7 testimony that other than one homicide case all of</p> <p>8 their assignments were what you've called dead-end</p> <p>9 cases? Is that what you're testifying to?</p> <p>10 MR. TAREN: Objection; asked and answered.</p> <p>11 BY THE WITNESS:</p> <p>12 A. When I gave the assignments to</p> <p>13 Officers Spalding and Echeverria, that was the</p> <p>14 practice.</p> <p>15 BY MR. KING:</p> <p>16 Q. Okay. But you don't know if Coleen</p> <p>17 Dugan, for example, followed that practice when</p> <p>18 she gave assignments to Spalding and Echeverria,</p> <p>19 correct?</p> <p>20 A. Correct.</p> <p>21 Q. Paragraph 9 indicates that Salemme and</p> <p>22 Barnes were aware of these assignments because</p> <p>23 they were copied on the emails.</p> <p>24 I assume that's the only way they were</p>	<p style="text-align: right;">60</p> <p>1 Sergeant Barnes and getting their approval as to</p> <p>2 what cases you should send to Spalding and</p> <p>3 Echeverria?</p> <p>4 A. I didn't get approval from</p> <p>5 Lieutenant Cesario, Sergeant Barnes, or the</p> <p>6 commander initially when they came to the unit</p> <p>7 because Lieutenant Cesario handpicked all of</p> <p>8 Shannon and Danny's assignments.</p> <p>9 Q. And how long did he do that?</p> <p>10 A. I would say a couple of months.</p> <p>11 Q. And when you say "handpicked," what do</p> <p>12 you mean? Would he give you a piece of paper with</p> <p>13 certain cases? Would he send you an email saying</p> <p>14 give them these? What was the process of him</p> <p>15 handpicking their assignments?</p> <p>16 A. When he arrived at work in the morning,</p> <p>17 he always printed out all the warrants, as well,</p> <p>18 and he would highlight which cases went to Danny</p> <p>19 and which cases went to Shannon.</p> <p>20 Q. And would he highlight anybody else's</p> <p>21 cases?</p> <p>22 A. No.</p> <p>23 Q. And around that time, Shannon Spalding</p> <p>24 and Danny Echeverria were the only two new officers</p>

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<p style="text-align: right;">61</p> <p>1 in the unit, correct?</p> <p>2 A. They were the newest officers, but we</p> <p>3 had had other new officers arrive prior to them</p> <p>4 coming.</p> <p>5 Q. I guess my question is other than</p> <p>6 them being copied on emails and what you've</p> <p>7 already testified to about Cesario picking their</p> <p>8 assignments for a limited period of time, is there</p> <p>9 any other way that Cesario or Salemm or Barnes</p> <p>10 would learn about which cases were assigned to</p> <p>11 the two plaintiffs other than the fact that they</p> <p>12 were copied on the emails?</p> <p>13 A. No.</p> <p>14 Q. So Paragraph 10 is a reference to what</p> <p>15 you just testified to that he stopped handpicking</p> <p>16 the cases at some point, correct?</p> <p>17 A. Yes.</p> <p>18 Q. Paragraph 11 is a reference to the</p> <p>19 homicide case you previously referenced, correct?</p> <p>20 A. Yes.</p> <p>21 Q. And do you remember who the subject or</p> <p>22 suspect was in that case?</p> <p>23 A. No, I do not.</p> <p>24 Q. Do you know if it was a Desmond Young?</p>	<p style="text-align: right;">63</p> <p>1 this, was this an in-person conversation, just you</p> <p>2 and him?</p> <p>3 A. No. It was in-person in the office,</p> <p>4 administrative office.</p> <p>5 Q. Do you recall if anybody else was</p> <p>6 present?</p> <p>7 A. I don't recall.</p> <p>8 Q. Okay. What specifically do you recall</p> <p>9 Cesario saying to you and you saying to him, if</p> <p>10 anything, in that conversation?</p> <p>11 A. How the hell did you give them a</p> <p>12 homicide case.</p> <p>13 Q. Do you remember him saying anything</p> <p>14 else?</p> <p>15 A. I told you only to give them dead-end</p> <p>16 cases.</p> <p>17 Q. Do you recall him saying anything else?</p> <p>18 A. I do not.</p> <p>19 Q. Do you recall saying anything in that</p> <p>20 conversation?</p> <p>21 A. Yes.</p> <p>22 Q. What did you say?</p> <p>23 A. I must have inadvertently gave them the</p> <p>24 case.</p>
<p style="text-align: right;">62</p> <p>1 Does that ring a bell at all?</p> <p>2 A. No, it does not.</p> <p>3 Q. You likely wouldn't remember the</p> <p>4 specific name of the offender?</p> <p>5 A. Absolutely not.</p> <p>6 Q. Do you recall when this occurred that</p> <p>7 you assigned this homicide case to Spalding and</p> <p>8 Echeverria?</p> <p>9 A. I don't recall.</p> <p>10 Q. Was it while they were working on</p> <p>11 Sergeant Barnes' team or Sergeant Mills' team?</p> <p>12 A. They were working on Sergeant Barnes'</p> <p>13 team.</p> <p>14 Q. And do you recall the circumstances of</p> <p>15 how you came to assign them a homicide case?</p> <p>16 A. I inadvertently assigned them a homicide</p> <p>17 case and the very next morning Lieutenant Cesario</p> <p>18 came into the office and was yelling at me and</p> <p>19 admonished me. And the next thing I knew I</p> <p>20 received an email from Sergeant Barnes saying that</p> <p>21 the case had been reassigned to a different</p> <p>22 officer.</p> <p>23 Q. And that next day when Sergeant --</p> <p>24 excuse me -- Lieutenant Cesario spoke to you about</p>	<p style="text-align: right;">64</p> <p>1 Q. Okay. Do you remember saying anything</p> <p>2 else in that conversation?</p> <p>3 A. No.</p> <p>4 Q. Then you're saying subsequent to that</p> <p>5 you got an email from Sergeant Barnes telling</p> <p>6 you to reassign the case to someone else?</p> <p>7 A. Negative. I received an email from</p> <p>8 Sergeant Barnes stating that the case had been</p> <p>9 reassigned to a different officer.</p> <p>10 Q. Okay. Do you have any recollection of</p> <p>11 who that different officer was?</p> <p>12 A. I have no idea.</p> <p>13 Q. Do you have any recollection of whether</p> <p>14 that different officer was a task force officer or</p> <p>15 a non-task force officer?</p> <p>16 A. I have no idea.</p> <p>17 Q. Do you have any recollection of whether</p> <p>18 that other reassignment was to officers on</p> <p>19 Spalding's and Echeverria's team or on another</p> <p>20 team?</p> <p>21 A. I would assume it would have been on the</p> <p>22 same team because it was a south case.</p> <p>23 Q. Okay. Let's look at Paragraph 13 of</p> <p>24 your affidavit. It indicates that on or around</p>

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<p style="text-align: right;">65</p> <p>1 June 25th, 2012, you were working at Homan Square</p> <p>2 and you overheard -- you know, I won't read it all,</p> <p>3 but Paragraphs 13 through 16 refer to a</p> <p>4 conversation that you had with Shannon Spalding</p> <p>5 and Dan Echeverria, correct?</p> <p>6 A. Correct. I did inform you that this</p> <p>7 occurred at Harrison and Kedzie and not Homan</p> <p>8 Square.</p> <p>9 Q. Yes. And do you still believe it was on</p> <p>10 or around June 25th, 2012?</p> <p>11 A. Yes.</p> <p>12 Q. And why don't you tell me what you</p> <p>13 recall about that incident or those conversations</p> <p>14 that are described in Paragraph 13 through 16?</p> <p>15 A. I was working overtime on that day. So</p> <p>16 I was in my office and I overheard Shannon outside</p> <p>17 of my office at the desk talking to Danny saying,</p> <p>18 you know, what do we have to do to get back on</p> <p>19 days.</p> <p>20 And that's when I got up from my desk</p> <p>21 and went out and approached them and said I don't</p> <p>22 know what you're complaining about because Danny</p> <p>23 requested to go on afternoons for family reasons</p> <p>24 and you were given the opportunity to stay on days</p>	<p style="text-align: right;">67</p> <p>1 time.</p> <p>2 A. Inside the file packet -- file folder</p> <p>3 was notes written down exactly verbatim as to what</p> <p>4 he wanted me to write in a to/from report stating</p> <p>5 that Danny had requested to go on afternoons due</p> <p>6 to family reasons and that Shannon was given the</p> <p>7 opportunity to stay on days or she could go on</p> <p>8 afternoons with her partner, at which time she</p> <p>9 chose to stay with her partner and go on</p> <p>10 afternoons, as well.</p> <p>11 Q. Just so I'm clear, are you saying what</p> <p>12 the papers said that were in the file -- I just</p> <p>13 want to know what Lieutenant Cesario said to you</p> <p>14 out of his mouth. Did he say what you just</p> <p>15 testified to or did he say here's a file, I want</p> <p>16 you to type this up? What did he say to you when</p> <p>17 he gave you that file?</p> <p>18 A. He said, here's a file. In here is the</p> <p>19 documents that I want you to type up in a to/from</p> <p>20 report. And he read, reread for me because it was</p> <p>21 in his handwriting and sometimes you cannot read</p> <p>22 his handwriting. He reread that to me and said, I</p> <p>23 would like you to put this in a to/from report and</p> <p>24 get it back to me as soon as possible.</p>
<p style="text-align: right;">66</p> <p>1 but you chose to stay with your partner.</p> <p>2 And she informed me at that time that</p> <p>3 that never occurred and Danny did, as well.</p> <p>4 And I told them that I had received a</p> <p>5 packet from Lieutenant Cesario where I was</p> <p>6 instructed to write a to/from report stating that</p> <p>7 and it was submitted to Lieutenant Cesario.</p> <p>8 Q. Okay. And when did Lieutenant Cesario</p> <p>9 allegedly give you this packet and ask you to do</p> <p>10 a to/from report? Do you know when?</p> <p>11 A. I would say it would have had to have</p> <p>12 been at least the week -- you know, within the week</p> <p>13 prior to this conversation.</p> <p>14 Q. Within a week prior to June 25th or at</p> <p>15 least within a week prior to the conversation you</p> <p>16 just testified to, you had a conversation with</p> <p>17 Cesario in which he gave you a packet, is that</p> <p>18 your testimony?</p> <p>19 A. Yes, a file folder.</p> <p>20 Q. Was anyone else present when he gave you</p> <p>21 that file folder?</p> <p>22 A. No.</p> <p>23 Q. And tell me specifically what he said to</p> <p>24 you and what, if anything, you said to him at that</p>	<p style="text-align: right;">68</p> <p>1 Q. What was your understanding of what that</p> <p>2 meant, a to/from report?</p> <p>3 A. It's very common, a to/from report.</p> <p>4 We're taught that in the Police Academy.</p> <p>5 Q. Sure. But what was your understanding</p> <p>6 of who it was supposed to be to and who it was</p> <p>7 supposed to be from?</p> <p>8 A. It was supposed to be from Lieutenant</p> <p>9 Cesario to Commander Salemme.</p> <p>10 Q. And did you type up that to/from report?</p> <p>11 A. Yes, I did.</p> <p>12 Q. And what did you do with it when you</p> <p>13 finished typing it up?</p> <p>14 A. I hand delivered it back to Lieutenant</p> <p>15 Cesario in his office.</p> <p>16 Q. You didn't email it to him, correct?</p> <p>17 A. Not to my knowledge.</p> <p>18 Q. And did you have any conversation</p> <p>19 with Lieutenant Cesario at the time you handed this</p> <p>20 to/from report back to him?</p> <p>21 A. I handed him the file folder and said</p> <p>22 the to/from report is inside.</p> <p>23 Q. Did he say anything in that</p> <p>24 conversation?</p>

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<p style="text-align: right;">69</p> <p>1 A. Thank you.</p> <p>2 Q. And do you have any personal knowledge</p> <p>3 of whether Lieutenant Cesario actually gave that</p> <p>4 report to Commander Salemm?</p> <p>5 A. No.</p> <p>6 Q. You don't have any knowledge of</p> <p>7 Lieutenant Cesario doing anything with that</p> <p>8 report, correct?</p> <p>9 A. Correct.</p> <p>10 MR. TAREN: You know, Counsel, at this point</p> <p>11 I'd like the record to be clear that we've</p> <p>12 specifically requested that document and have</p> <p>13 never received anything.</p> <p>14 MR. KING: And I will let the record reflect</p> <p>15 that we have specifically requested it and based</p> <p>16 on what we've been told we don't believe that</p> <p>17 document exists.</p> <p>18 BY MR. KING:</p> <p>19 Q. You were testifying about the</p> <p>20 conversation with Danny and Shannon where you told</p> <p>21 them about Cesario asking you to type up the</p> <p>22 to/from. I just want to make sure.</p> <p>23 Other than what you have testified to,</p> <p>24 do you recall anything else said by you or Shannon</p>	<p style="text-align: right;">71</p> <p>1 A. Absolutely.</p> <p>2 Q. Police officers can get injured, can die</p> <p>3 without backup, correct?</p> <p>4 A. Correct.</p> <p>5 Q. And it's your testimony with an open</p> <p>6 door that Lieutenant Cesario instructed all of</p> <p>7 these sergeants not to provide backup to Danny and</p> <p>8 Shannon and not to work with them at all? That's</p> <p>9 your testimony?</p> <p>10 A. My testimony is that he instructed all</p> <p>11 of those sergeants to inform his team -- their team</p> <p>12 members not to provide backup for Shannon and</p> <p>13 Danny.</p> <p>14 Q. Do you specifically recall hearing the</p> <p>15 words "backup, not providing backup"?</p> <p>16 A. Yes.</p> <p>17 Q. And do you specifically recall hearing</p> <p>18 the words "not to work with them at all"?</p> <p>19 A. Yes.</p> <p>20 Q. Other than what's reflected in</p> <p>21 Paragraph 18, do you recall overhearing anything</p> <p>22 else from that meeting in Lieutenant Cesario's</p> <p>23 office?</p> <p>24 A. No, I don't.</p>
<p style="text-align: right;">70</p> <p>1 or Danny in that conversation?</p> <p>2 A. No.</p> <p>3 Q. If you look at Paragraph 18, it</p> <p>4 indicates that in June, 2012, you were outside of</p> <p>5 Lieutenant Cesario's office when you overheard him</p> <p>6 in a meeting ordering Sergeant Mills, Barnes,</p> <p>7 Mason, Stack, Nallen, and Tirado to instruct their</p> <p>8 teams of officers to not provide any backup for</p> <p>9 Shannon or Danny and to not work with them at all.</p> <p>10 Is that a true statement?</p> <p>11 A. Yes, it is.</p> <p>12 Q. Can you tell me was anybody else present</p> <p>13 where you were outside of this office overhearing</p> <p>14 it?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. Was the door to Cesario's office open or</p> <p>17 closed?</p> <p>18 A. Open.</p> <p>19 Q. This is a very serious allegation,</p> <p>20 wouldn't you agree?</p> <p>21 A. Absolutely.</p> <p>22 Q. For a police officer to instruct other</p> <p>23 police officers not to back up a police officer,</p> <p>24 that's a very serious allegation, correct?</p>	<p style="text-align: right;">72</p> <p>1 Q. Had the meeting just started when you</p> <p>2 overheard this conversation? Was it near the end</p> <p>3 of the meeting, if you know?</p> <p>4 A. I'm unaware. The sergeant's door was</p> <p>5 closed and the lieutenant's office was inside of</p> <p>6 the sergeant's office. But administrative staff,</p> <p>7 we go in and out of the sergeant's office quite</p> <p>8 frequently. So I believe I was in there to get the</p> <p>9 sheets off of the wall. When I say get the sheets</p> <p>10 off the wall, that's because I did the A&As, which</p> <p>11 is to record who's working, who's not working, so</p> <p>12 forth. And I opened up the sergeant's door, closed</p> <p>13 the sergeant's door, walked over to the wall to</p> <p>14 remove the sheets and that's when I heard what I</p> <p>15 heard.</p> <p>16 Q. So you were in the sergeant's office</p> <p>17 when you heard that?</p> <p>18 A. Yes.</p> <p>19 Q. How long do you think you were in the</p> <p>20 sergeant's office?</p> <p>21 A. Three to five minutes.</p> <p>22 Q. Okay. In the three to five minutes that</p> <p>23 you were in the sergeant's office adjacent to this</p> <p>24 meeting with an open door, you don't recall</p>

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<p style="text-align: right;">73</p> <p>1 anything else that you overheard other than what's</p> <p>2 in Paragraph 18?</p> <p>3 A. Nothing else.</p> <p>4 Q. For the three to five minutes that you</p> <p>5 were in the sergeant's office, was the meeting</p> <p>6 going on that entire time in Lieutenant Cesario's</p> <p>7 office?</p> <p>8 A. I would have no knowledge to that</p> <p>9 because after I left the office, the sergeant's</p> <p>10 office, I went into my office.</p> <p>11 Q. But it was your understanding when you</p> <p>12 went into the sergeant's office that this meeting</p> <p>13 was going on in Lieutenant Cesario's office with</p> <p>14 the door open, correct?</p> <p>15 A. Yes, the door was open. The office was</p> <p>16 not big enough to fit all those people in the</p> <p>17 office.</p> <p>18 Q. But my point is the meeting was going on</p> <p>19 when you walked into the sergeant's office,</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. It was still going on when you left the</p> <p>23 sergeant's office, correct?</p> <p>24 A. To the best of my knowledge, it was.</p>	<p style="text-align: right;">75</p> <p>1 day.</p> <p>2 Q. The Roxane Blecharczyk incident that</p> <p>3 you just described is what's referenced in</p> <p>4 Paragraphs 21 and 22 of your affidavit, correct?</p> <p>5 A. And 23, yes.</p> <p>6 Q. Separate and apart from the Roxane</p> <p>7 incident -- I want to go back to Paragraph 19 -- do</p> <p>8 you have any other basis aside from the Roxane</p> <p>9 incident for that allegation that all members of</p> <p>10 each team are usually put on the police reports?</p> <p>11 A. Yes, it was com- --</p> <p>12 Q. What's the basis of that?</p> <p>13 A. It was common knowledge and I saw arrest</p> <p>14 reports that sergeants would sign off on.</p> <p>15 Q. So it's your testimony you saw arrest</p> <p>16 reports with officers' names on them that you knew</p> <p>17 had not been on the scene?</p> <p>18 A. No. It is my testimony that when a team</p> <p>19 member would make an arrest all of the whole team's</p> <p>20 names would go on the arrest report for the</p> <p>21 majority of arrests.</p> <p>22 Q. And you base that on what?</p> <p>23 A. Documents that I have seen.</p> <p>24 Q. Do you see all arrest reports as a</p>
<p style="text-align: right;">74</p> <p>1 Q. And in the three to five minutes you</p> <p>2 were adjacent to this open door meeting, you don't</p> <p>3 recall hearing anything said other than what's in</p> <p>4 Paragraph 18, is that your testimony?</p> <p>5 A. Yes, it is.</p> <p>6 Q. Let's look at Paragraph 19 of your</p> <p>7 affidavit. It says on all teams in the Fugitive</p> <p>8 Apprehension Unit all members of each team are</p> <p>9 usually put on each of the team members' police</p> <p>10 reports in order to bolster activity even when</p> <p>11 they were not present at the scene of activity.</p> <p>12 What's the basis of your understanding</p> <p>13 that that was the practice?</p> <p>14 A. I've seen many police reports, arrest</p> <p>15 reports indicating the same thing. And there</p> <p>16 was one incident in particular that involved</p> <p>17 Officer Blecharczyk where she was on the floor</p> <p>18 outside of my office, my administrative office</p> <p>19 yelling very loudly so everyone could hear that she</p> <p>20 was very upset that she was put in Box 1, which</p> <p>21 means you are the actual arresting officer, of an</p> <p>22 arrest report for an offender and a CR number had</p> <p>23 been obtained for that and she wasn't even in the</p> <p>24 country. Sergeant Barnes had carried her for the</p>	<p style="text-align: right;">76</p> <p>1 function of your job?</p> <p>2 A. I do not.</p> <p>3 Q. Do you have any responsibilities that</p> <p>4 involve you seeing arrest reports?</p> <p>5 A. I do not.</p> <p>6 Q. This alleged practice of putting</p> <p>7 everyone on the team on a police report, is it your</p> <p>8 belief that that was the practice of a particular</p> <p>9 sergeant or all sergeants in the Fugitive</p> <p>10 Apprehension Unit?</p> <p>11 A. That was the practice with all sergeants</p> <p>12 in the unit.</p> <p>13 Q. How often would you have an occasion</p> <p>14 to review an arrest report in the Fugitive</p> <p>15 Apprehension Unit?</p> <p>16 A. Not often, but I would get reports from</p> <p>17 the officers. When they would close their cases,</p> <p>18 they had to provide us with documentation for me to</p> <p>19 prepare CompStat because when I no longer was in</p> <p>20 charge of giving out assignments I became the main</p> <p>21 girl in the office and that's when CompStat came</p> <p>22 about. So I would prepare the CompStat book every</p> <p>23 week for CompStat meetings. And in order to show</p> <p>24 your activity and what you're doing the commander</p>

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<p style="text-align: right;">77</p> <p>1 would have to attend these meetings at 35th and</p> <p>2 Michigan and the officers would have to give us</p> <p>3 weekly updates on what they were doing with their</p> <p>4 cases. So when I would receive those reports, I</p> <p>5 would receive the reports and state subject was</p> <p>6 located, so-and-so, so-and-so, and these are the</p> <p>7 arresting officers and it would be the whole team.</p> <p>8 Q. And do you ever remember seeing any such</p> <p>9 reports for the team that Spalding and Echeverria</p> <p>10 were on where everybody else on the team was listed</p> <p>11 except Spalding and Echeverria?</p> <p>12 A. Yes.</p> <p>13 Q. How many times do you recall that</p> <p>14 happening?</p> <p>15 A. Many.</p> <p>16 Q. Can you recall when any of the many</p> <p>17 times that happened? Do you remember years or</p> <p>18 months?</p> <p>19 A. I'd say June, 2012, to March of 2013.</p> <p>20 Q. Do you have any specific recollection</p> <p>21 of how many police reports you saw with everyone on</p> <p>22 Spalding and Echeverria's team listed on the arrest</p> <p>23 report other than them?</p> <p>24 A. I didn't see the actual arrest report.</p>	<p style="text-align: right;">79</p> <p>1 lieutenant's attention and said they're just</p> <p>2 sending in the same thing with no updated</p> <p>3 information.</p> <p>4 So we had changed the practice where you</p> <p>5 had to put updated on and you had to put the date</p> <p>6 so that we knew that you were actively working</p> <p>7 those cases.</p> <p>8 Q. My question is when you got those</p> <p>9 reports from the individual police officers, am I</p> <p>10 correct that the way that you would have determined</p> <p>11 that all of the other members of the team were</p> <p>12 listed on an arrest other than Danny and Shannon</p> <p>13 is you would have to look at each of the officers'</p> <p>14 reports that they submitted to you and then look to</p> <p>15 see if Danny or Shannon were on a particular arrest</p> <p>16 and if the other team members were on a particular</p> <p>17 arrest, correct?</p> <p>18 A. Correct. But it was also common</p> <p>19 knowledge that the practice was going on.</p> <p>20 Q. Okay. Is it your testimony that in</p> <p>21 the course of your duties as you received these</p> <p>22 reports for CompStat purposes that you would</p> <p>23 consciously take a look at the arrests on Danny</p> <p>24 and Shannon's team and you'd tally up whether all</p>
<p style="text-align: right;">78</p> <p>1 I saw the updated document from the officer who had</p> <p>2 to give me information to put into the CompStat</p> <p>3 book. And their file with the information that</p> <p>4 they had to provide would have in there where the</p> <p>5 subject was arrested and who were the arresting</p> <p>6 officers.</p> <p>7 Q. And you would get that from each police</p> <p>8 officer or from their sergeant?</p> <p>9 A. Each police officer.</p> <p>10 Q. Okay. So if I'm understanding this</p> <p>11 correctly, to figure out that everybody on their</p> <p>12 team other than Danny and Shannon were on an</p> <p>13 arrest report, you would have to look at each of</p> <p>14 the individual reports that you got from officers</p> <p>15 and then you could see that all of the other</p> <p>16 officers on the team were recorded as being part of</p> <p>17 this arrest other than Danny and Shannon? Is that</p> <p>18 fair to say that's how you would have to do it?</p> <p>19 A. Yes. I had to review every report every</p> <p>20 week because there was -- when it first started,</p> <p>21 the officers were tending to send in the same exact</p> <p>22 report that they had sent in the following week --</p> <p>23 the prior week and that wasn't sufficient. And I</p> <p>24 was catching that and I brought that to the</p>	<p style="text-align: right;">80</p> <p>1 the officers were on there other than them? Is</p> <p>2 that an exercise that you engaged in?</p> <p>3 A. The exercise that I engaged in is in</p> <p>4 my database we had a listing of every assignment</p> <p>5 that every officer was assigned. And so we would</p> <p>6 know -- in the comments we would know -- we would</p> <p>7 have a CB number. We could look up the CB number,</p> <p>8 which is the arrest report, and find out exactly</p> <p>9 who is on that arrest report.</p> <p>10 Q. I understand, but you said you didn't</p> <p>11 look at arrest reports on a regular basis. You had</p> <p>12 no job responsibilities relating to arrest reports.</p> <p>13 I want to know how you determined on any particular</p> <p>14 arrest that everybody on Shannon and Danny's team</p> <p>15 was credited except for them two. How did you</p> <p>16 determine that?</p> <p>17 A. When you say "everyone," I can't speak</p> <p>18 for every single person. I am stating that the</p> <p>19 majority of Danny and Shannon's team, the majority</p> <p>20 of the members did not include them on their arrest</p> <p>21 reports. And how I became to know that was through</p> <p>22 their CompStat reports or through looking up in the</p> <p>23 databases that we had access to the CB numbers,</p> <p>24 verifying the CB numbers because they had to be</p>

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<p style="text-align: right;">81</p> <p>1 printed out and put into the CompStat book showing</p> <p>2 that that person was arrested. And in that arrest</p> <p>3 report, it would have all of the arresting</p> <p>4 officers' names. That was my duty to include that</p> <p>5 and staple that with their report into the CompStat</p> <p>6 book.</p> <p>7 Q. And is it your testimony that you --</p> <p>8 it's just something that you began to notice that</p> <p>9 Danny and Shannon weren't on some arrest reports</p> <p>10 and the rest of their team members were?</p> <p>11 A. No. It was common knowledge and I had</p> <p>12 heard about it, so then I started looking into it.</p> <p>13 Q. I want to hear how you looked into it.</p> <p>14 I want to hear what pieces of paper you looked at,</p> <p>15 how frequently you did that.</p> <p>16 A. Like I said, if I received a CompStat</p> <p>17 report from an officer stating that that subject</p> <p>18 was arrested, that subject was topic of the</p> <p>19 CompStat meeting for that week. And they submitted</p> <p>20 their report stating arrested on such-and-such a</p> <p>21 day. I had to go into the databases and I had to</p> <p>22 type in that CB number that they had in their</p> <p>23 report and I had to print out the arrest report.</p> <p>24 And when I did that, I was able to see all of the</p>	<p style="text-align: right;">83</p> <p>1 where Danny and Shannon were not listed, do you</p> <p>2 have any personal knowledge of whether they were</p> <p>3 involved in the arrest or not?</p> <p>4 A. I do not.</p> <p>5 Q. With respect to the Roxane Blecharczyk</p> <p>6 and Felix Batista conversations that you describe</p> <p>7 in Paragraphs 22 and 23 of your affidavit, where</p> <p>8 did those conversations take place?</p> <p>9 A. They took place at Harrison and Kedzie</p> <p>10 on the main floor.</p> <p>11 Q. Do you recall who besides the two of</p> <p>12 them and you were present?</p> <p>13 A. Sergeant Mills.</p> <p>14 Q. Do you recall anybody else that was</p> <p>15 present?</p> <p>16 A. There were many officers from many</p> <p>17 teams. The afternoon teams had all come in for</p> <p>18 roll call and they were all at their computers. I</p> <p>19 can't recall specifically who was there, who may</p> <p>20 have had the day off. You know, I don't recall</p> <p>21 specifically.</p> <p>22 Q. Okay. And other than what's in the</p> <p>23 affidavit, do you recall anything else that Roxane</p> <p>24 Blecharczyk said or that Felix Batista said at that</p>
<p style="text-align: right;">82</p> <p>1 names of the arresting officers. And it became a</p> <p>2 pattern of every time -- the majority of times that</p> <p>3 the team members that Shannon and Danny worked</p> <p>4 with, they were purposely left off of the reports.</p> <p>5 Q. That's what it appeared to you?</p> <p>6 A. Absolutely.</p> <p>7 Q. And did you notice any other occasions</p> <p>8 where other members of Danny and Shannon's team</p> <p>9 were not on an arrest report or were they on every</p> <p>10 single report, the other members of the team? In</p> <p>11 other words, that happened with other members, as</p> <p>12 well, correct, that not every -- not every report</p> <p>13 would indicate that every member of the team was a</p> <p>14 participant in the arrest, correct?</p> <p>15 A. Very infrequent.</p> <p>16 Q. You think it was more frequent with</p> <p>17 Danny and Shannon and less frequent with others on</p> <p>18 the team?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Did you ever have a conversation</p> <p>21 with anybody about this more frequent practice that</p> <p>22 you began to notice?</p> <p>23 A. No.</p> <p>24 Q. On arrest reports or CompStat reports</p>	<p style="text-align: right;">84</p> <p>1 time?</p> <p>2 A. No.</p> <p>3 Q. Other than what's in the affidavit, do</p> <p>4 you recall anyone else other than Roxane or Felix</p> <p>5 saying anything at that time?</p> <p>6 A. No.</p> <p>7 Q. So according to you, they made the</p> <p>8 statements in Paragraph 22 and 23 and then nobody</p> <p>9 said anything about that or in response to that,</p> <p>10 correct?</p> <p>11 A. I didn't stay present for the remainder</p> <p>12 of the conversation. I was walking through.</p> <p>13 Q. That's all you heard of the</p> <p>14 conversation?</p> <p>15 A. I heard her speaking very loudly and</p> <p>16 that's what got me out of my seat because I heard</p> <p>17 her speak -- start yelling about how in the fuck</p> <p>18 did I get a CR number and, you know, I'm arresting</p> <p>19 officer in Box 1. And then I heard Batista come</p> <p>20 over, tell her what he said, and I proceeded to go</p> <p>21 up to the commander's office.</p> <p>22 Q. Did you tell the commander or have any</p> <p>23 conversation with anyone about what you had just</p> <p>24 observed in terms of what Roxane and Felix said?</p>

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<p style="text-align: right;">85</p> <p>1 A. No. And I could probably be certain</p> <p>2 that the commander was not in his office at that</p> <p>3 time.</p> <p>4 Q. In other words, you didn't take any</p> <p>5 action in response to what you overheard?</p> <p>6 A. No. Sergeant Mills was standing right</p> <p>7 there.</p> <p>8 MR. TAREN: Alan, is this a good time to take</p> <p>9 five minutes?</p> <p>10 MR. KING: Sure, absolutely.</p> <p>11 (WHEREUPON, a recess was had from</p> <p>12 11:29 to 11:45 p.m.)</p> <p>13 MR. KING: Back on the record.</p> <p>14 BY MR. KING:</p> <p>15 Q. Ms. Hanna, if I can ask you to take</p> <p>16 a look at Paragraph 25 of your affidavit. It</p> <p>17 refers to a conversation that you had with</p> <p>18 Lieutenant Cesario.</p> <p>19 Can you just tell me what you recall</p> <p>20 about that conversation, what you recall Cesario</p> <p>21 saying and you saying, if anything?</p> <p>22 A. I happened to be in Lieutenant Cesario's</p> <p>23 office. Him and I, we had many one-on-one</p> <p>24 conversations with closed doors because I was his</p>	<p style="text-align: right;">87</p> <p>1 A. Correct.</p> <p>2 Q. And when he told you about Shannon</p> <p>3 Spalding not being allowed to go back to Homan</p> <p>4 Square, did you say anything or have any</p> <p>5 reaction?</p> <p>6 A. Okay.</p> <p>7 Q. Was anything else said about that</p> <p>8 subject at that time?</p> <p>9 A. No.</p> <p>10 Q. Did you ever have a conversation with</p> <p>11 anyone else about Shannon Spalding being banned</p> <p>12 from Homan Square?</p> <p>13 A. No.</p> <p>14 Q. Paragraph 26 of your affidavit</p> <p>15 talks about a couple of databases, Accurint and</p> <p>16 LEADS 2000.</p> <p>17 Let me ask you this: There's been</p> <p>18 some -- well, strike that.</p> <p>19 Do you know if all of the officers in</p> <p>20 Fugitive Apprehension used Accurint or is it just</p> <p>21 the task force officers?</p> <p>22 A. All of the officers.</p> <p>23 Q. Okay. And there's been some testimony</p> <p>24 in the case that with respect to Accurint there</p>
<p style="text-align: right;">86</p> <p>1 right-hand girl. And he received a phone call and</p> <p>2 did this, like one minute, answered the phone call</p> <p>3 and spoke with someone on the phone. And I knew it</p> <p>4 was Commander O'Grady because when he said hello,</p> <p>5 obviously Commander O'Grady must have said it was</p> <p>6 him and he said hello, Commander O'Grady. And then</p> <p>7 the conversation proceeded. I did not hear what</p> <p>8 the conversation was.</p> <p>9 He hung up the phone and that's when he</p> <p>10 had said to me that was Commander O'Grady and he</p> <p>11 just informed me that Shannon is no longer allowed,</p> <p>12 like I said, she's no longer permitted, she's</p> <p>13 banned from Homan Square, and if she goes there,</p> <p>14 she will be arrested.</p> <p>15 Q. You were not able to hear anything that</p> <p>16 Commander O'Grady said on the phone call, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And did you hear or pay any attention to</p> <p>19 anything Lieutenant Cesario said other than hello,</p> <p>20 Commander O'Grady?</p> <p>21 A. No.</p> <p>22 Q. So everything you know about that</p> <p>23 conversation is after Lieutenant Cesario hung</p> <p>24 up and then he spoke to you about it, correct?</p>	<p style="text-align: right;">88</p> <p>1 essentially was a password that was up on the</p> <p>2 bulletin board and anybody could get the password</p> <p>3 and use Accurint. Would that be correct? Is that</p> <p>4 consistent with your recollection?</p> <p>5 A. That's consistent, although there were</p> <p>6 many times when officers would come into our office</p> <p>7 and tell us that the password no longer worked.</p> <p>8 Q. Okay. Do you know one way or the other</p> <p>9 whether Spalding or Echeverria ever tried to use</p> <p>10 the password for Accurint?</p> <p>11 A. I'm unaware if they ever did.</p> <p>12 Q. So Paragraph 26, why don't you tell me</p> <p>13 about that conversation or the exchange that you</p> <p>14 had with Detective Kevin Culhane?</p> <p>15 A. Yes. He came into my office and asked</p> <p>16 me for a list of officers that were still requiring</p> <p>17 access to both Accurint and LEADS 2000, at which</p> <p>18 time I gave him the list. I provided him the list</p> <p>19 and had informed him that both Danny and Shannon</p> <p>20 had put in numerous requests to do this and</p> <p>21 everyone else that had put in requests after them</p> <p>22 had already been approved and they still hadn't</p> <p>23 been approved. And that is when he told me that</p> <p>24 he was told directly by the lieutenant not to give</p>

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<p style="text-align: right;">89</p> <p>1 them access.</p> <p>2 Q. Was anyone else present for that</p> <p>3 conversation?</p> <p>4 A. Yes.</p> <p>5 Q. Who?</p> <p>6 A. The office staff.</p> <p>7 Q. Are you aware of anyone else overhearing</p> <p>8 Detective Culhane say to you that he had been</p> <p>9 specifically instructed by the lieutenant not to</p> <p>10 give them access?</p> <p>11 MR. TAREN: Objection.</p> <p>12 BY MR. KING:</p> <p>13 Q. Are you aware of anyone else hearing</p> <p>14 that?</p> <p>15 A. The office staff.</p> <p>16 Q. You think they may or may not have heard</p> <p>17 it, correct?</p> <p>18 A. They absolutely heard it.</p> <p>19 Q. Who specifically do you remember being</p> <p>20 present that absolutely heard it?</p> <p>21 A. I don't remember specifically.</p> <p>22 Q. Do you remember any person that was</p> <p>23 present that you believe absolutely heard it?</p> <p>24 A. I do not.</p>	<p style="text-align: right;">91</p> <p>1 any of those six to eight other officers were?</p> <p>2 A. No, I do not.</p> <p>3 Q. Do you have any recollection of whether</p> <p>4 those six to eight other officers came to the unit</p> <p>5 before Spalding and Echeverria or after Spalding</p> <p>6 and Echeverria?</p> <p>7 A. What I recall is that the list that</p> <p>8 I provided to him was a total of six to eight</p> <p>9 officers, not six to eight additional officers.</p> <p>10 Q. Okay.</p> <p>11 A. And on that list, they were requests</p> <p>12 from officers who had put in their first request</p> <p>13 and on that request included Danny and Shannon</p> <p>14 who had requested numerous times already.</p> <p>15 Q. Okay.</p> <p>16 A. But the other officers, it was their</p> <p>17 first time requesting.</p> <p>18 Q. Do you have a recollection of -- strike</p> <p>19 that.</p> <p>20 The other officers that were on the</p> <p>21 list have been in the Fugitive Apprehension Unit</p> <p>22 longer than Danny and Shannon, correct?</p> <p>23 A. I can't be certain of that.</p> <p>24 Q. Who do you recall coming to the unit</p>
<p style="text-align: right;">90</p> <p>1 Q. And do you have any idea of a date,</p> <p>2 year, or month when this conversation with</p> <p>3 Detective Culhane allegedly took place?</p> <p>4 A. I do not.</p> <p>5 Q. And it indicates in Paragraph 26 that</p> <p>6 you provided him a list of officers that still</p> <p>7 needed access to the databases, correct?</p> <p>8 A. I'm sorry. Could you rephrase that?</p> <p>9 Q. It indicates in Paragraph 26 of your</p> <p>10 affidavit that you provided him with a list of</p> <p>11 officers that needed or had requested access to</p> <p>12 the databases, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And am I correct that Spalding and</p> <p>15 Echeverria were not the only officers on that list,</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. Do you recall how many other officers</p> <p>19 were on that list?</p> <p>20 A. I don't recall exactly how many.</p> <p>21 Q. Do you recall approximately how many?</p> <p>22 A. Approximately six to eight other</p> <p>23 officers.</p> <p>24 Q. Do you have any recollection of who</p>	<p style="text-align: right;">92</p> <p>1 after Danny and Shannon?</p> <p>2 A. There were many officers, Tamika Rainey,</p> <p>3 Jason Landrum.</p> <p>4 Q. Do you have any specific recollection of</p> <p>5 whether the other officers on that list were in the</p> <p>6 unit before or after Spalding and Echeverria?</p> <p>7 A. No, I do not.</p> <p>8 Q. So was this a list that you already</p> <p>9 had? He walks in and asks you about a list and you</p> <p>10 go, here it is, here's the list of the people, or</p> <p>11 did you have to create this list?</p> <p>12 A. I had to create the list.</p> <p>13 Q. Okay. Did you do that right in front</p> <p>14 of Kevin Culhane while he was standing there or</p> <p>15 did you do this and then get it to him later?</p> <p>16 A. No, it was already created.</p> <p>17 Q. Well, that was my question. When he</p> <p>18 asked you for it, did the list already exist?</p> <p>19 A. Yes.</p> <p>20 Q. You said, Kevin Culhane, got your list</p> <p>21 right here? You had it already ready, is that your</p> <p>22 testimony?</p> <p>23 A. Yes.</p> <p>24 Q. Are you aware that to get a password and</p>

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<p style="text-align: right;">93</p> <p>1 authorization to use LEADS 2000 that officers have</p> <p>2 to go through a fingerprinting process?</p> <p>3 A. I am not.</p> <p>4 Q. I assume you have no knowledge as to</p> <p>5 when, if at all, Officer Spalding or Echeverria</p> <p>6 went through the fingerprinting process to be</p> <p>7 authorized to use LEADS 2000, correct?</p> <p>8 A. Correct.</p> <p>9 Q. When Detective Culhane allegedly told</p> <p>10 you that he was specifically instructed not to give</p> <p>11 them access to the databases, did you discuss that</p> <p>12 with anyone?</p> <p>13 A. No.</p> <p>14 Q. Paragraph 27 says on November 1st, 2012,</p> <p>15 Lieutenant Cesario walked into the office and said</p> <p>16 Shannon and Danny filed a lawsuit and they'll be on</p> <p>17 the news tonight. Make sure you watch it.</p> <p>18 Do you remember Cesario saying anything</p> <p>19 else about that subject at that time?</p> <p>20 A. No.</p> <p>21 Q. Do you remember anybody else saying</p> <p>22 anything about the lawsuit or the fact that they</p> <p>23 were going to be on television at that time?</p> <p>24 A. At that time, no.</p>	<p style="text-align: right;">95</p> <p>1 Q. Who do you recall indicating that this</p> <p>2 was a bunch of a bullshit?</p> <p>3 A. No one in particular.</p> <p>4 Q. Someone did. Was it more than one</p> <p>5 person or --</p> <p>6 A. Absolutely.</p> <p>7 Q. You don't remember anybody in particular</p> <p>8 saying this is a bunch a bullshit --</p> <p>9 A. No.</p> <p>10 Q. -- or words to that effect?</p> <p>11 A. No.</p> <p>12 Q. Other than Officer Dugan saying, oh, we</p> <p>13 are going to get in trouble and some unidentified</p> <p>14 people saying this is a bunch of bullshit, do you</p> <p>15 remember anything else that anybody said on that</p> <p>16 next day after they went on television about the</p> <p>17 lawsuit?</p> <p>18 A. There were various comments made by</p> <p>19 various individuals throughout the entire unit, in</p> <p>20 financial crimes. I mean, it was the talk of the</p> <p>21 entire floor the entire day.</p> <p>22 Q. I would imagine it would be and I'd like</p> <p>23 to know every conversation that you can recall that</p> <p>24 was the talk of the floor that day.</p>
<p style="text-align: right;">94</p> <p>1 Q. Do you recall who else, if anyone, was</p> <p>2 present when Lieutenant Cesario made that</p> <p>3 statement?</p> <p>4 A. I know myself was present, Whitney</p> <p>5 Garbarz was present, and Nancy Grand was present.</p> <p>6 Q. And did you or the other two individuals</p> <p>7 that you recall being present say anything about</p> <p>8 the fact that the lawsuit was filed or that they</p> <p>9 were going to be on television?</p> <p>10 A. No.</p> <p>11 Q. Paragraph 28 says the following day</p> <p>12 everyone was talking about the lawsuit. At one</p> <p>13 point, Officer Dugan said to me, quote, "Oh, we are</p> <p>14 going to get in trouble."</p> <p>15 Do you remember Officer Dugan saying</p> <p>16 anything else that day in reference to the lawsuit</p> <p>17 other than what you have in Paragraph 28?</p> <p>18 A. Not verbatim.</p> <p>19 Q. Do you have any general recollection</p> <p>20 of her saying anything else in reference to the</p> <p>21 lawsuit?</p> <p>22 A. Everyone was speaking about the lawsuit.</p> <p>23 It was -- and I recollect conversations being had</p> <p>24 about this is a bunch of a bullshit, you know.</p>	<p style="text-align: right;">96</p> <p>1 A. I can't recall specifics.</p> <p>2 Q. Do you recall Lieutenant Cesario saying</p> <p>3 anything that day about the lawsuit?</p> <p>4 A. No.</p> <p>5 Q. Do you recall Sergeant Barnes or</p> <p>6 Sergeant Mills saying anything that day about the</p> <p>7 lawsuit?</p> <p>8 A. No.</p> <p>9 Q. Paragraph 29 of your affidavit refers</p> <p>10 to your responsibilities with respect to VRI.</p> <p>11 That's what you've already testified to, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And then Paragraph 30 indicates that</p> <p>14 one day Cesario told you that if you received a</p> <p>15 VRI from Shannon or Danny to toss it out, pretend</p> <p>16 like you never received it. That's what you've</p> <p>17 already testified to, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Paragraph 30 goes on to say that you</p> <p>20 followed his orders on at least two occasions and</p> <p>21 pretended to never receive Shannon or Danny's</p> <p>22 request for overtime.</p> <p>23 So would it be correct that that may</p> <p>24 have happened only two times?</p>

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<p style="text-align: right;">97</p> <p>1 MR. TAREN: Objection.</p> <p>2 BY THE WITNESS:</p> <p>3 A. To the best of my recollection, it was</p> <p>4 two times for certain.</p> <p>5 BY MR. KING:</p> <p>6 Q. Okay. Paragraph 31 talks about an</p> <p>7 argument you had with Lieutenant Cesario over</p> <p>8 this practice.</p> <p>9 Where did that conversation take place?</p> <p>10 A. In Lieutenant Cesario's office.</p> <p>11 Q. Was the door closed?</p> <p>12 A. Yes.</p> <p>13 Q. Anyone else present?</p> <p>14 A. Just him and I.</p> <p>15 Q. And what do you remember saying to</p> <p>16 him and what do you remember him saying to you?</p> <p>17 A. I don't feel comfortable doing this</p> <p>18 practice. It's unethical. It's against general</p> <p>19 orders. And I don't want to be in the middle of</p> <p>20 all of this that's going on. And that was after</p> <p>21 they appeared on TV with the lawsuit. And I told</p> <p>22 him that I wanted to change the way that the forms</p> <p>23 were submitted and to have them sent via email to</p> <p>24 me so that I would have a record of dates and</p>	<p style="text-align: right;">99</p> <p>1 following a practice of disregarding and pretending</p> <p>2 you did not receive Spalding's or Echeverria's</p> <p>3 request for VRI?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Paragraph 32 refers to another</p> <p>6 conversation between you and Cesario.</p> <p>7 Do you recall when that conversation</p> <p>8 took place?</p> <p>9 A. I do not.</p> <p>10 Q. Do you know if it was after the</p> <p>11 November, 2012 conversation you reference in</p> <p>12 Paragraph 31?</p> <p>13 A. I do not.</p> <p>14 Q. Anyone else present for that</p> <p>15 conversation?</p> <p>16 A. The office staff was present.</p> <p>17 Q. Okay. Do you have a specific</p> <p>18 recollection of anybody else being present?</p> <p>19 A. No.</p> <p>20 Q. So what did he say to you at that time?</p> <p>21 A. He was taking away all of Danny's</p> <p>22 assignments and having them reassigned, to reassign</p> <p>23 them to other officers.</p> <p>24 Q. Okay. Do you know if Shannon Spalding</p>
<p style="text-align: right;">98</p> <p>1 times.</p> <p>2 Q. Okay. Did he say anything?</p> <p>3 A. I'm sure he did.</p> <p>4 Q. Do you have a recollection of what he</p> <p>5 said?</p> <p>6 A. He obviously agreed to the process</p> <p>7 because it went into place.</p> <p>8 Q. He agreed with your recommendation to</p> <p>9 change the process, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Do you remember him saying anything in</p> <p>12 that meeting other than agreeing with you on the</p> <p>13 change in process?</p> <p>14 A. No.</p> <p>15 Q. Do you have any -- you said this was</p> <p>16 after the lawsuit was filed, that conversation?</p> <p>17 A. Yes.</p> <p>18 Q. Do you have any idea of how long after</p> <p>19 or the date of that conversation that's referenced</p> <p>20 in Paragraph 31?</p> <p>21 A. To the best of my recollection, it was</p> <p>22 in November of 2012.</p> <p>23 Q. And is it your testimony that up until</p> <p>24 that conversation in November of 2012 you were</p>	<p style="text-align: right;">100</p> <p>1 was still actively at work at that time or was she</p> <p>2 on leave and only Danny was working?</p> <p>3 A. I don't recall.</p> <p>4 Q. But he asked for a printout of Danny's</p> <p>5 cases, not Danny's and Shannon's cases, correct?</p> <p>6 A. To the best of my knowledge, it was</p> <p>7 Danny's.</p> <p>8 Q. I assume you have no personal knowledge</p> <p>9 as to why Lieutenant Cesario asked for a printout</p> <p>10 of those cases?</p> <p>11 A. I believe it had something to do with</p> <p>12 the Third District initiative and the Seventh</p> <p>13 District initiative because we had initiatives</p> <p>14 going on where only -- officers were assigned to</p> <p>15 the Third District initiative and so they would</p> <p>16 work only on Third District cases and then officers</p> <p>17 that were assigned to the Seventh District were</p> <p>18 only given Seventh District cases. And I believe</p> <p>19 at that time the reason for that may have been</p> <p>20 because he had switched from one initiative to</p> <p>21 another or he wasn't on one of the initiatives.</p> <p>22 That's to the best of my knowledge.</p> <p>23 Q. Was that based on anything Cesario said</p> <p>24 or you kind of putting two and two together knowing</p>

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<p style="text-align: right;">101</p> <p>1 what was going on at the time?</p> <p>2 A. Yes, that's just me putting two and two</p> <p>3 together.</p> <p>4 Q. Okay. Paragraph 33 talks about another</p> <p>5 conversation with Cesario. It indicates that it</p> <p>6 was a couple of months after the conversation in</p> <p>7 Paragraph 32, is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recall approximately when the</p> <p>10 conversation took place, if you know what month and</p> <p>11 year the conversation in Paragraph 33 took place?</p> <p>12 A. I do not.</p> <p>13 Q. It indicates that you and</p> <p>14 Officer Sultana were present, is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. Was anyone else present?</p> <p>17 A. I don't recall.</p> <p>18 Q. And what do you recall</p> <p>19 Lieutenant Cesario saying at that time?</p> <p>20 A. He admonished Officer Sultana and</p> <p>21 asked her who told you to reassign Danny's cases.</p> <p>22 Q. Okay. And then did Officer Sultana or</p> <p>23 you say anything in response?</p> <p>24 A. I don't believe I was in charge of</p>	<p style="text-align: right;">103</p> <p>1 thought, you don't have any knowledge that what he</p> <p>2 was referring to was the circumstance where he had</p> <p>3 allegedly told you to take his assignments away</p> <p>4 that was months prior to this, correct?</p> <p>5 A. I'm sorry. Can you say that again?</p> <p>6 Q. You assumed that he was referring to</p> <p>7 the prior situation months prior to that where he</p> <p>8 had asked for the list of Danny's assignments? You</p> <p>9 assumed that? He didn't tell you that that's what</p> <p>10 he was talking about?</p> <p>11 A. No. Yes, I assumed that that's what he</p> <p>12 was referring to. And then I spoke up on Aisha's</p> <p>13 behalf because she's a very quiet person. I spoke</p> <p>14 on her behalf and said you were the one who</p> <p>15 directed me to reassign Danny's cases.</p> <p>16 Q. Okay. So is it your testimony that</p> <p>17 when months prior to this he directed you to take</p> <p>18 Danny's cases away and reassign them was Danny</p> <p>19 not getting any cases?</p> <p>20 A. I wouldn't say that.</p> <p>21 Q. So did you take any action to reassign</p> <p>22 his cases when Lieutenant Cesario asked you for</p> <p>23 that list?</p> <p>24 A. Yes, his cases were reassigned.</p>
<p style="text-align: right;">102</p> <p>1 that database at that time. I think I was in</p> <p>2 charge of CompStat at that time. So he was</p> <p>3 directing it to Officer Sultana because she was in</p> <p>4 north now. So they were under Sergeant Mills'</p> <p>5 team, which was the north team. And he was</p> <p>6 admonishing Aisha as to why his assignments had</p> <p>7 been reassigned because he wasn't working his</p> <p>8 assignments.</p> <p>9 Q. And when he did that, did you have</p> <p>10 an understanding that he was referring to the</p> <p>11 reassignment that he had inquired with you</p> <p>12 about months before that or did you know what</p> <p>13 reassignment he was talking about?</p> <p>14 A. Yes. I assumed that's what he was</p> <p>15 referring to.</p> <p>16 Q. You assumed that, correct? He didn't</p> <p>17 say that, correct?</p> <p>18 A. I said it to him. I responded and told</p> <p>19 him, informed him that he directed me to take his</p> <p>20 assignments away and reassign them.</p> <p>21 Q. And when you said that, did Lieutenant</p> <p>22 Cesario say anything?</p> <p>23 A. No.</p> <p>24 Q. Other than what you said and you</p>	<p style="text-align: right;">104</p> <p>1 Q. But he continued to get a whole new</p> <p>2 batch of cases, correct?</p> <p>3 A. Out of all of the officers that worked</p> <p>4 in Fugitive Apprehension, Danny and Shannon got the</p> <p>5 least amount of cases.</p> <p>6 Q. I guess my question is why would</p> <p>7 Lieutenant Cesario wake up months later and be</p> <p>8 upset about something that he asked to be done</p> <p>9 months prior? Do you have any idea why that</p> <p>10 would be?</p> <p>11 MR. TAREN: Objection.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I can't be for certain that it was</p> <p>14 months later. I told you I wasn't aware -- I mean,</p> <p>15 I'm not for certain if it was months later, but it</p> <p>16 was definitely some time that had gone by.</p> <p>17 BY MR. KING:</p> <p>18 Q. So Paragraph 33 says a couple months</p> <p>19 later. You're not sure if it was a couple months</p> <p>20 later, is that your testimony?</p> <p>21 A. No, I'm sure it was a couple of months,</p> <p>22 but a couple, two, three, four.</p> <p>23 Q. Paragraph 34 relates a conversation that</p> <p>24 you had with Shannon and Danny about working VRI</p>

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<p style="text-align: right;">105</p> <p>1 under Sergeant Mills.</p> <p>2 What do you recall -- where did that</p> <p>3 conversation take place?</p> <p>4 A. The conversation took place at Harrison</p> <p>5 and Kedzie.</p> <p>6 Q. And was anyone else present other than</p> <p>7 the three of you?</p> <p>8 A. No.</p> <p>9 Q. And what did each of the participants</p> <p>10 say in that conversation as best you can recall?</p> <p>11 A. I recall Shannon telling me that they</p> <p>12 were admonished for working their regular cases</p> <p>13 while they were working the VRI initiative on the</p> <p>14 weekend, at which time I had said to them that I</p> <p>15 found that very odd because everyone else in the</p> <p>16 entire unit worked their regular cases during VRI.</p> <p>17 Q. Okay. Do you recall you or Shannon or</p> <p>18 Danny saying anything else in that conversation?</p> <p>19 A. No.</p> <p>20 Q. What's the basis for your belief that</p> <p>21 everyone else in the unit worked on their regular</p> <p>22 cases during VRI?</p> <p>23 A. Because I would get the closeout forms</p> <p>24 for CompStat. And when I would receive the</p>	<p style="text-align: right;">107</p> <p>1 Q. Okay. And it's your testimony that</p> <p>2 every other officer in the department other</p> <p>3 than Spalding and Echeverria made regular arrests</p> <p>4 outside of the VRI area while they were working on</p> <p>5 VRI?</p> <p>6 MR. TAREN: Objection; mischaracterizes her</p> <p>7 testimony.</p> <p>8 BY MR. KING:</p> <p>9 Q. Is that your testimony?</p> <p>10 A. No, that is not my testimony. You just</p> <p>11 stated that every other officer in the department.</p> <p>12 Q. Yes. You're not saying that?</p> <p>13 A. I'm not saying that because every other</p> <p>14 officer in the department doesn't work VRI.</p> <p>15 Q. I mean, is it your testimony that</p> <p>16 every other officer in the Fugitive Apprehension</p> <p>17 Unit when you were there and Danny and Shannon</p> <p>18 were there when they worked VRI they made arrests</p> <p>19 outside of the VRI area, also known as I guess</p> <p>20 regular arrests? Is it your testimony that every</p> <p>21 other officer other than the two of them did that?</p> <p>22 A. No, it is not my testimony that every</p> <p>23 other officer did.</p> <p>24 Q. Sometimes that happened, correct?</p>
<p style="text-align: right;">106</p> <p>1 reports, it would have dates and times and it would</p> <p>2 also have -- I got an activity log from the</p> <p>3 sergeants for the weekend of what arrests were made</p> <p>4 and who they were. And then when I went into the</p> <p>5 database, I was able to see if, in fact, those</p> <p>6 people that had been arrested or, you know, that</p> <p>7 they -- well, actually arrested, if they were</p> <p>8 regular cases that they had been assigned or if</p> <p>9 they were actually cases that were assigned</p> <p>10 specifically only for VRI.</p> <p>11 Q. And was it part of your job to notice</p> <p>12 that or make an assessment of whether they were</p> <p>13 regular arrests or VRI arrests?</p> <p>14 A. It was my job to enter it into the</p> <p>15 database.</p> <p>16 Q. I understand that.</p> <p>17 A. So I would notice immediately because</p> <p>18 if I saw the name listed on the activity log for</p> <p>19 VRI and I compared it to the VRI list and that</p> <p>20 name was not on there, then I would have to go to</p> <p>21 the database and find that name. Then I knew that</p> <p>22 that was one of their regular cases that they had</p> <p>23 been assigned that they had worked on while they</p> <p>24 were working VRI.</p>	<p style="text-align: right;">108</p> <p>1 A. Frequently that happened.</p> <p>2 Q. Do you have a specific recollection</p> <p>3 of -- strike that.</p> <p>4 Do you have a recollection of whether</p> <p>5 any officers that were on the same team as Spalding</p> <p>6 and Echeverria did that, made arrests outside of</p> <p>7 the VRI area?</p> <p>8 A. Yes.</p> <p>9 Q. What officers are you specifically aware</p> <p>10 of from their team that did that?</p> <p>11 A. I do not recall.</p> <p>12 Q. Would it be fair to say that if officers</p> <p>13 were reprimanded by their sergeant you wouldn't</p> <p>14 necessarily have knowledge of that, correct?</p> <p>15 A. I wouldn't have knowledge of it, but the</p> <p>16 practice wouldn't have continued.</p> <p>17 Q. Paragraph 35 of your affidavit again</p> <p>18 talks about another conversation with you and</p> <p>19 Lieutenant Cesario.</p> <p>20 Where did this conversation take place?</p> <p>21 A. In our administrative office.</p> <p>22 Q. And was anyone else present for this</p> <p>23 conversation?</p> <p>24 A. To the best of my knowledge I'm sure</p>

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<p style="text-align: right;">109</p> <p>1 there was, but I do not recall.</p> <p>2 Q. It indicates here that Cesario came</p> <p>3 into the office screaming how the fuck did these</p> <p>4 two motherfuckers get back on days? Who the fuck</p> <p>5 do they know? They're messing with the wrong</p> <p>6 people.</p> <p>7 Is that what you recall Lieutenant</p> <p>8 Cesario saying?</p> <p>9 A. Yes.</p> <p>10 Q. Do you recall him saying anything else</p> <p>11 at that time?</p> <p>12 A. No.</p> <p>13 Q. Do you recall you or anyone else</p> <p>14 saying anything or responding at that time?</p> <p>15 A. No.</p> <p>16 Q. If you look at the top of Page 6 of your</p> <p>17 affidavit, it appears that there's either some text</p> <p>18 missing, there's a partial sentence at the top of</p> <p>19 Paragraph -- rather, the top of Page 6. Do you</p> <p>20 have any knowledge as to what that's about, why</p> <p>21 this does not seem to be consistently flowing from</p> <p>22 Page 5 to Page 6?</p> <p>23 A. I do not.</p> <p>24 Q. There's a Paragraph 35 of the affidavit</p>	<p style="text-align: right;">111</p> <p>1 just had a surgical procedure on April 1st.</p> <p>2 He said, okay, maybe we can do this over</p> <p>3 the phone. It seems to be pretty simple. He</p> <p>4 informed me of what the CR number was pertaining</p> <p>5 to.</p> <p>6 And I told him that never happened. I</p> <p>7 don't know what you're talking about.</p> <p>8 Q. That's fine. My question was only what</p> <p>9 was in Paragraph 36. I don't know if all that</p> <p>10 detail was in Paragraph 36. Is that what you're</p> <p>11 suggesting?</p> <p>12 A. Yes, I am.</p> <p>13 Q. And when you met with him and gave a</p> <p>14 statement, you said you indicated that that's</p> <p>15 not what happened.</p> <p>16 What did he say in terms of what the</p> <p>17 allegation was or what do you recall him asking</p> <p>18 you? What was the incident he asked you about?</p> <p>19 A. I recall him asking me -- along with</p> <p>20 another officer who he stated he was training,</p> <p>21 placing me into a locked room and being there for</p> <p>22 approximately three hours and then repeatedly</p> <p>23 asking me if I had overheard a conversation on</p> <p>24 Shannon's phone in the hallway with me and</p>
<p style="text-align: right;">110</p> <p>1 and a Paragraph 37 of the affidavit.</p> <p>2 Do you recall at the time you signed it</p> <p>3 there being a Paragraph 36 of the affidavit?</p> <p>4 A. Yes.</p> <p>5 Q. And did that Paragraph 36 include the</p> <p>6 language at the top of Page 6, quote, "Headquarters</p> <p>7 at 35th Street and Michigan Avenue to give a</p> <p>8 statement about a CR file with me as a witness"?</p> <p>9 A. Yes.</p> <p>10 Q. Do you have a copy of your affidavit</p> <p>11 that includes Paragraph 36?</p> <p>12 A. I do not.</p> <p>13 Q. Do you have any knowledge as to why the</p> <p>14 plaintiffs' counsel produced an affidavit in this</p> <p>15 case that does not have the complete Paragraph 36?</p> <p>16 A. I do not.</p> <p>17 Q. What's your recollection of what</p> <p>18 Paragraph 36 stated?</p> <p>19 A. While I was on medical leave in</p> <p>20 April of 2013, I was called by Sergeant Muscolino</p> <p>21 from IAD informing me that I was named as a witness</p> <p>22 on a CR number, that I needed to come down to 35th</p> <p>23 and Michigan to give a formal statement, at which</p> <p>24 time I told him I was unable to do so because I had</p>	<p style="text-align: right;">112</p> <p>1 Shannon present with a recording of</p> <p>2 Sergeant Mills.</p> <p>3 Q. Okay. And what did you say in response</p> <p>4 to that?</p> <p>5 A. No, it never occurred.</p> <p>6 Q. And did they ask you anything else?</p> <p>7 A. They repeatedly asked me. They asked</p> <p>8 me different ways. They kept on repeating and</p> <p>9 repeating, would you know Sergeant Mills' voice if</p> <p>10 she were to play that?</p> <p>11 And I said, yes, of course, I would know</p> <p>12 Sergeant Mills' voice because he worked in Area 5</p> <p>13 Detective Division. I've spoke with him on the</p> <p>14 phone many times.</p> <p>15 Q. Sure. Sure.</p> <p>16 A. Questions like that. And they just kept</p> <p>17 on questioning me and questioning me and wanting me</p> <p>18 to go along with the CR number.</p> <p>19 Q. Where did the interview take place?</p> <p>20 A. At 35th and Michigan at IAD.</p> <p>21 Q. And it's your recollection that the room</p> <p>22 was locked and you were in there for three hours?</p> <p>23 A. Approximately.</p> <p>24 Q. Did they ever tell you that you were not</p>

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<p style="text-align: right;">113</p> <p>1 free to leave?</p> <p>2 A. No.</p> <p>3 Q. You didn't think you were under</p> <p>4 arrest --</p> <p>5 A. No.</p> <p>6 Q. -- correct?</p> <p>7 You have an understanding that</p> <p>8 Coleen Dugan reported something that led to</p> <p>9 that CR and then your interview, correct?</p> <p>10 MR. TAREN: Objection to the word "reported."</p> <p>11 BY MR. KING:</p> <p>12 Q. Is that your understanding, that that</p> <p>13 CR initiated from Coleen Dugan believing she</p> <p>14 overheard some recording of Mills' voice? You</p> <p>15 understand that, correct?</p> <p>16 MR. TAREN: Objection; assumes matters not in</p> <p>17 evidence.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't know who reported it. All I</p> <p>20 know is that her name was listed and my name was</p> <p>21 listed.</p> <p>22 BY MR. KING:</p> <p>23 Q. Okay. If Coleen Dugan reported -- well,</p> <p>24 let's not use the word "reported."</p>	<p style="text-align: right;">115</p> <p>1 didn't even know took place, that's inappropriate.</p> <p>2 MR. KING: Well, it's not inappropriate. I'm</p> <p>3 not going to ask her if she knows about this</p> <p>4 testimony.</p> <p>5 MR. TAREN: Okay. Well --</p> <p>6 BY MR. KING:</p> <p>7 Q. But I'm going to tell you what Coleen</p> <p>8 Dugan testified about that incident under oath.</p> <p>9 MR. TAREN: I'm going to object to that.</p> <p>10 BY MR. KING:</p> <p>11 Q. At Page 94, beginning at Line 23, Coleen</p> <p>12 Dugan testified:</p> <p>13 "Jan was facing forward and had her</p> <p>14 phone like this. So as I was coming up the stairs,</p> <p>15 Shannon had something in her hand, but I heard</p> <p>16 Sergeant Mills' voice. And I thought, why is</p> <p>17 Sergeant Mills here in the morning? It was loud</p> <p>18 and it was boisterous, and I am thinking that was</p> <p>19 Sergeant Mills as I am walking up the stairs here.</p> <p>20 So when I got to the top of the stairs, I kind of</p> <p>21 looked at Shannon and Jan, and I was like, where is</p> <p>22 Sergeant Mills? Because it was loud. So I walked</p> <p>23 over to my office, and I don't remember the details</p> <p>24 of what I heard at this moment. And I was kind of</p>
<p style="text-align: right;">114</p> <p>1 If Coleen Dugan said she overheard what</p> <p>2 she thought was a recording of Mills' voice when</p> <p>3 you and Shannon were together, do you even</p> <p>4 remember that incident where Coleen asked you</p> <p>5 about that?</p> <p>6 MR. TAREN: Objection. There's been no</p> <p>7 testimony about Coleen asking her anything.</p> <p>8 BY THE WITNESS:</p> <p>9 A. No.</p> <p>10 BY MR. KING:</p> <p>11 Q. No. Okay. So you're not only saying</p> <p>12 there was no recording of Mills' voice; you're</p> <p>13 saying the entire incident as it was explained</p> <p>14 to you in the CR proceeding never occurred nor</p> <p>15 anything like it? Is that your testimony?</p> <p>16 A. Yes, it is.</p> <p>17 Q. I'm going to ask you a couple more</p> <p>18 questions about that incident.</p> <p>19 MR. KING: If you'd like -- Counsel, I'm going</p> <p>20 to use part of Coleen Dugan's deposition testimony</p> <p>21 to ask the questions.</p> <p>22 MR. TAREN: Counsel, you can use whatever you</p> <p>23 want to ask them. But in terms of showing the</p> <p>24 deposition that Ms. Hanna testified earlier she</p>	<p style="text-align: right;">116</p> <p>1 confused, in my own mind, did he leave her a</p> <p>2 message like that? Did she record him?"</p> <p>3 Is it your testimony that no incident in</p> <p>4 connection like that happened?</p> <p>5 MR. TAREN: Objection. Counsel, I have to</p> <p>6 strenuously object.</p> <p>7 MR. KING: It's a perfectly appropriate</p> <p>8 question.</p> <p>9 MR. TAREN: No, it's not because you're asking</p> <p>10 her about Coleen Dugan's observations that don't</p> <p>11 have anything to do with her.</p> <p>12 MR. KING: Well, they have a lot to do with</p> <p>13 her. And my question is --</p> <p>14 MR. TAREN: Excuse me, Counsel. You want to</p> <p>15 ask her what she observed at that time, whether she</p> <p>16 observed Coleen Dugan, I don't have any problem</p> <p>17 with that. But the testimony that you quoted does</p> <p>18 not lend itself to any answer.</p> <p>19 MR. KING: Are you done?</p> <p>20 MR. TAREN: Yeah.</p> <p>21 BY MR. KING:</p> <p>22 Q. Is it your testimony that no incident</p> <p>23 along the lines of what Coleen Dugan just described</p> <p>24 as I read to you from her transcript -- is it your</p>

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<p style="text-align: right;">117</p> <p>1 testimony that no such incident occurred?</p> <p>2 MR. TAREN: I'll repeat my objection.</p> <p>3 BY THE WITNESS:</p> <p>4 A. That is my testimony.</p> <p>5 BY MR. KING:</p> <p>6 Q. She goes on to say at Page 95, beginning</p> <p>7 at Line 16:</p> <p>8 "And then Jan came into my office and</p> <p>9 sat there. And I said, was Shannon recording</p> <p>10 Sergeant Mills? I go, what was that? She goes, I</p> <p>11 didn't hear it. And then she proceeded to repeat</p> <p>12 whatever it was I heard. So I said, okay, and</p> <p>13 asked me if that's basically what I heard, and I</p> <p>14 said yeah. But you didn't hear it from what's in</p> <p>15 her hand?"</p> <p>16 Is it your testimony that there was no</p> <p>17 conversation between you and Coleen Dugan along</p> <p>18 the lines of what I just read to you?</p> <p>19 A. No testimony, nothing.</p> <p>20 Q. That's false testimony?</p> <p>21 A. Absolutely. There was no conversation.</p> <p>22 Q. Okay. When Spalding and Echeverria</p> <p>23 joined the Fugitive Apprehension Unit,</p> <p>24 Sergeant Barnes' team lost two officers and then</p>	<p style="text-align: right;">119</p> <p>1 A. No, I have not.</p> <p>2 Q. Has she made any efforts to contact you</p> <p>3 or speak with you to your knowledge?</p> <p>4 A. I would be unaware of that because I</p> <p>5 have her blocked on my phone.</p> <p>6 Q. Why do you have her blocked on your</p> <p>7 phone?</p> <p>8 A. I don't care to speak with her.</p> <p>9 Q. Why do you not care to speak with</p> <p>10 Coleen Dugan?</p> <p>11 A. Because she put me on a false CR number</p> <p>12 and made allegations that were untrue, which I find</p> <p>13 very unethical and immoral.</p> <p>14 Q. That's the CR number we've been talking</p> <p>15 about?</p> <p>16 A. Yes.</p> <p>17 Q. Were you charged with any wrongdoing in</p> <p>18 the CR to your knowledge?</p> <p>19 A. No, not to my knowledge.</p> <p>20 MR. KING: Here's 2 and 3.</p> <p>21 (WHEREUPON, certain documents were</p> <p>22 marked Hanna Deposition Exhibit</p> <p>23 Nos. 2 and 3, for identification,</p> <p>24 as of 08-12-2015.)</p>
<p style="text-align: right;">118</p> <p>1 gained Spalding and Echeverria. Are you aware of</p> <p>2 that?</p> <p>3 A. I don't recall that.</p> <p>4 Q. Do you remember two officers in the unit</p> <p>5 named Kim and Kyle?</p> <p>6 A. Yes.</p> <p>7 Q. Does that refresh your recollection</p> <p>8 that Kim and Kyle left the unit and Spalding and</p> <p>9 Echeverria joined the unit?</p> <p>10 A. I recall Kim and Kyle leaving the unit,</p> <p>11 but I don't recall what team Kim and Kyle were on.</p> <p>12 Q. And do you have a recollection that</p> <p>13 Kim and Kyle left the unit because they wanted</p> <p>14 to go back on third watch in 25, Area 25?</p> <p>15 A. Yes.</p> <p>16 Q. Do you have a recollection before</p> <p>17 Spalding and Echeverria arrived for their first</p> <p>18 day in the unit of you telling Coleen Dugan that</p> <p>19 you understood they were coming from medical</p> <p>20 integrity IAD?</p> <p>21 A. No.</p> <p>22 Q. Have you spoken to Coleen Dugan at all</p> <p>23 since you went on television with the plaintiffs</p> <p>24 in this case?</p>	<p style="text-align: right;">120</p> <p>1 BY MR. KING:</p> <p>2 Q. Ms. Hanna, I'm showing you two documents</p> <p>3 that have been marked Hanna Deposition Exhibits 2</p> <p>4 and 3.</p> <p>5 Do you recognize these documents or this</p> <p>6 form?</p> <p>7 A. I do.</p> <p>8 Q. And you understand these exhibits to be</p> <p>9 Shannon Spalding and Danny Echeverria requesting to</p> <p>10 work VRI overtime on 29 July, 2012, correct?</p> <p>11 A. I assume, yes.</p> <p>12 Q. And July 29, 2012, would have been</p> <p>13 before the practice was changed that they had</p> <p>14 to request it via email, correct?</p> <p>15 A. Correct.</p> <p>16 Q. Do you have any knowledge as to whether</p> <p>17 Spalding or Echeverria were approved to work</p> <p>18 overtime on July 29, 2012?</p> <p>19 A. I do not.</p> <p>20 MR. KING: This is going to be 4.</p> <p>21 (WHEREUPON, certain documents were</p> <p>22 marked Hanna Deposition Exhibit</p> <p>23 Nos. 4 through 7, for</p> <p>24 identification, as of 08-12-2015.)</p>

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<p style="text-align: right;">121</p> <p>1 BY MR. KING:</p> <p>2 Q. Well, if I haven't totally confused</p> <p>3 myself, I've shown you documents that have been</p> <p>4 marked Deposition Exhibits 4, 5, 6, and 7. Let's</p> <p>5 start with Exhibit 4.</p> <p>6 I just want to ask you is Exhibit 4 --</p> <p>7 you see the email at the bottom of the first page</p> <p>8 of Exhibit 4 is from Robert Cesario and you're</p> <p>9 copied on it, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And this is an email with</p> <p>12 Lieutenant Cesario saying -- communicating the VRI</p> <p>13 schedule for July 28th and 29th, correct?</p> <p>14 A. This says the 28th.</p> <p>15 Q. Okay. If you look at the attachments,</p> <p>16 it has July 28th and 29th, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And this document indicates that</p> <p>19 Echeverria and Spalding were on the list for</p> <p>20 VRI for July 29th, correct?</p> <p>21 A. This document indicates that, yes.</p> <p>22 Q. And I believe you just told me in</p> <p>23 reference to Deposition Exhibits 2 and 3 that</p> <p>24 you have no knowledge as to whether, in fact, they</p>	<p style="text-align: right;">123</p> <p>1 A. I do not.</p> <p>2 Q. Exhibit 7 is another email from Cesario</p> <p>3 on which you're copied. It's the VRI schedule for</p> <p>4 August 25th and 26th and it indicates that Spalding</p> <p>5 and Echeverria are scheduled to work overtime on</p> <p>6 August 26th, correct?</p> <p>7 A. On this document, yes.</p> <p>8 Q. Do you have any knowledge as to whether</p> <p>9 or not they, in fact, worked overtime on</p> <p>10 August 26th, 2012?</p> <p>11 A. I do not.</p> <p>12 MR. KING: This is 8.</p> <p>13 (WHEREUPON, a certain document was</p> <p>14 marked Hanna Deposition Exhibit</p> <p>15 No. 8, for identification, as of</p> <p>16 08-12-2015.)</p> <p>17 BY MR. KING:</p> <p>18 Q. Showing you another email, this is from</p> <p>19 Shannon Spalding to you, at least the lower email</p> <p>20 on the page that's been marked Deposition Exhibit</p> <p>21 No. 8.</p> <p>22 Do you have any recollection of this</p> <p>23 email?</p> <p>24 A. I do not.</p>
<p style="text-align: right;">122</p> <p>1 did work the overtime on July 29th, correct?</p> <p>2 A. Correct.</p> <p>3 Q. If you look at Exhibit 5, which is</p> <p>4 another VRI email from Cesario that you're</p> <p>5 copied on, this document is the VRI schedule for</p> <p>6 August 4th and 5th, correct?</p> <p>7 A. Correct.</p> <p>8 Q. And the document indicates that for</p> <p>9 August 5th, Echeverria and Spalding are on the list</p> <p>10 to work overtime, correct?</p> <p>11 A. On this document, yes.</p> <p>12 Q. And do you have any knowledge as to</p> <p>13 whether or not Spalding and Echeverria worked</p> <p>14 overtime on August 5th?</p> <p>15 A. I do not.</p> <p>16 Q. And Exhibit 6 similarly is an email</p> <p>17 from Cesario conveying the VRI schedule for</p> <p>18 August 11th and 12th and it indicates that Spalding</p> <p>19 and Echeverria were scheduled to work overtime on</p> <p>20 August 12, 2012, correct?</p> <p>21 A. On this document, yes.</p> <p>22 Q. And do you have any knowledge as to</p> <p>23 whether they, in fact, worked overtime on August</p> <p>24 12th, 2012, meaning Spalding and Echeverria?</p>	<p style="text-align: right;">124</p> <p>1 Q. Would you agree that this is an email</p> <p>2 where Shannon Spalding is letting you know that</p> <p>3 she's not going to be able to work VRI on</p> <p>4 November 11th, 2012, correct?</p> <p>5 A. It appears that way, but I find it very</p> <p>6 suspicious that VRI and it's VRP, because she's</p> <p>7 very particular about her writing.</p> <p>8 Q. Okay. Is it your suggestion that she</p> <p>9 did not send this email?</p> <p>10 A. No, it is not my suggestion.</p> <p>11 Q. Shannon Spalding can make typos, too,</p> <p>12 correct?</p> <p>13 A. I'm sure.</p> <p>14 Q. Does this refresh your recollection as</p> <p>15 to whether there were ever any instances where</p> <p>16 Shannon Spalding had asked to work overtime on a</p> <p>17 particular date and then informed you that she</p> <p>18 wasn't available to work overtime?</p> <p>19 A. No.</p> <p>20 Q. But you don't doubt that that may have</p> <p>21 happened on November 11, 2012, correct?</p> <p>22 A. I don't doubt. I don't recall.</p> <p>23</p> <p>24</p>

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<p style="text-align: right;">125</p> <p>1 (WHEREUPON, a certain document was</p> <p>2 marked Hanna Deposition Exhibit</p> <p>3 No. 9, for identification, as of</p> <p>4 08-12-2015.)</p> <p>5 BY MR. KING:</p> <p>6 Q. Ms. Hanna, I'm showing you another</p> <p>7 document that's been marked Deposition Exhibit</p> <p>8 No. 9, which are some email exchanges between you</p> <p>9 and Lieutenant Cesario. I would just ask you to</p> <p>10 take a look at that and let me know if you recall</p> <p>11 this exchange.</p> <p>12 A. If you're asking me to recall something</p> <p>13 from March of 2002 --</p> <p>14 MR. TAREN: '12.</p> <p>15 BY THE WITNESS:</p> <p>16 A. -- or 2012 and that's over three years</p> <p>17 ago, it's kind of impractical.</p> <p>18 BY MR. KING:</p> <p>19 Q. You might remember. You might not. I'm</p> <p>20 not suggesting you have to remember. I'm just</p> <p>21 asking if you do remember.</p> <p>22 MR. TAREN: Is there a question pending?</p> <p>23 MR. KING: If she recalls this email exchange.</p> <p>24</p>	<p style="text-align: right;">127</p> <p>1 Lieutenant Cesario. I'm just going to ask if</p> <p>2 you happen to recall these exchanges?</p> <p>3 A. I don't recall.</p> <p>4 Q. You don't have any reason to doubt that</p> <p>5 this is an authentic email exchange between you</p> <p>6 and Lieutenant Cesario, correct?</p> <p>7 A. No, I have no doubt.</p> <p>8 Q. Let's look at Exhibit 11, which are a</p> <p>9 couple of emails that you are also a party to.</p> <p>10 Do you have any recollection of</p> <p>11 Deposition Exhibit No. 11?</p> <p>12 A. No, I do not.</p> <p>13 Q. Okay. In the top email, you say,</p> <p>14 "Daniel disregard this IA, please."</p> <p>15 I assume if you don't recall the email,</p> <p>16 you don't recall why you told him to disregard it?</p> <p>17 A. Correct.</p> <p>18 MR. KING: 12.</p> <p>19 (WHEREUPON, a certain document was</p> <p>20 marked Hanna Deposition Exhibit</p> <p>21 No. 12, for identification, as of</p> <p>22 08-12-2015.)</p> <p>23 BY MR. KING:</p> <p>24 Q. Ms. Hanna, I'm showing you another</p>
<p style="text-align: right;">126</p> <p>1 BY THE WITNESS:</p> <p>2 A. I don't recall.</p> <p>3 BY MR. KING:</p> <p>4 Q. Okay. And in the top email, you write,</p> <p>5 "Perhaps. Talk to you when you get in."</p> <p>6 I assume if you don't recall this email,</p> <p>7 you don't recall any conversation with Cesario</p> <p>8 about this when he got in?</p> <p>9 A. Correct.</p> <p>10 Q. And although you don't recall it, you</p> <p>11 don't have any reason to believe this is not an</p> <p>12 authentic email exchange between you and</p> <p>13 Lieutenant Cesario in Exhibit 9, correct?</p> <p>14 A. I don't have any belief to think it's</p> <p>15 not authentic.</p> <p>16 MR. KING: 10 and 11.</p> <p>17 (WHEREUPON, certain documents were</p> <p>18 marked Hanna Deposition Exhibit</p> <p>19 Nos. 10 and 11, for identification,</p> <p>20 as of 08-12-2015.)</p> <p>21 BY MR. KING:</p> <p>22 Q. Ms. Hanna, if you can take a look at</p> <p>23 what's been marked as Deposition Exhibit No. 10,</p> <p>24 which are some email exchanges between you and</p>	<p style="text-align: right;">128</p> <p>1 group of emails that's marked Deposition Exhibit</p> <p>2 No. 12. And I will note that you don't seem to be</p> <p>3 a participant in these emails, but there is a</p> <p>4 reference to you in an email from Cesario to</p> <p>5 Thomas Mills toward the middle of the page. It</p> <p>6 says, "Tom, did you assign this to Spalding? We</p> <p>7 are aware of the warrant, the circumstances of why</p> <p>8 a warrant was issued, and did not assign it for</p> <p>9 follow up. Jan Hanna put a line through the name</p> <p>10 on the list that she distributed."</p> <p>11 Do you have any recollection of the</p> <p>12 circumstances that this email might be referring to</p> <p>13 of you putting a line through a name?</p> <p>14 A. No.</p> <p>15 (WHEREUPON, a certain document was</p> <p>16 marked Hanna Deposition Exhibit</p> <p>17 No. 13, for identification, as of</p> <p>18 08-12-2015.)</p> <p>19 BY MR. KING:</p> <p>20 Q. Ms. Hanna, I'm showing you another group</p> <p>21 of emails that's on Deposition Exhibit No. 12 that</p> <p>22 you are a party to.</p> <p>23 Do you have any recollection of these</p> <p>24 emails?</p>

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<p style="text-align: right;">129</p> <p>1 A. Are you referring to Exhibit No. 13?</p> <p>2 Q. I'm sorry. Yes, 13.</p> <p>3 A. Do I have a recollection of this?</p> <p>4 Q. Yeah.</p> <p>5 A. No.</p> <p>6 Q. Okay. I'll just ask. My understanding</p> <p>7 of this is that Danny Echeverria was assigned some</p> <p>8 cases and then he sends an email to you saying</p> <p>9 that one of them, Bradley Pruitt, had already been</p> <p>10 processed by another team.</p> <p>11 Does that look to be the case?</p> <p>12 A. Yes.</p> <p>13 Q. And then above that, Lieutenant Cesario</p> <p>14 says, "Thanks, Dan," and he I guess offers an</p> <p>15 explanation for how that may have occurred.</p> <p>16 Would that be a fair description of the</p> <p>17 emails?</p> <p>18 A. Yes.</p> <p>19 Q. And his explanation, Lieutenant</p> <p>20 Cesario's, of how Bradley Pruitt could have been</p> <p>21 assigned to Danny and he figured out he was</p> <p>22 processed by another team already, would you say</p> <p>23 his explanation is correct? Would you agree with</p> <p>24 that? Do you think it's a correct explanation?</p>	<p style="text-align: right;">131</p> <p>1 September 28th, 2012?</p> <p>2 A. I do not.</p> <p>3 (WHEREUPON, a certain document was</p> <p>4 marked Hanna Deposition Exhibit</p> <p>5 No. 15, for identification, as of</p> <p>6 08-12-2015.)</p> <p>7 BY MR. KING:</p> <p>8 Q. I would like to direct your attention to</p> <p>9 Deposition Exhibit No. 15. You don't appear to be</p> <p>10 copied on this exhibit. I'd just ask if you think</p> <p>11 you've ever seen this before?</p> <p>12 A. No. Like I testified before, I didn't</p> <p>13 know that there was a fingerprinting process.</p> <p>14 Q. Okay. So as you sit here today, you</p> <p>15 don't have any personal knowledge as to whether</p> <p>16 Spalding and Echeverria's delay in getting access</p> <p>17 to LEADS 2000 related to them not going through</p> <p>18 the fingerprinting process? You don't know,</p> <p>19 correct?</p> <p>20 A. What I do know is what Detective Culhane</p> <p>21 told me, which is that he was given a direct order</p> <p>22 from Lieutenant Cesario to not allow them access to</p> <p>23 the databases.</p> <p>24 Q. You don't know anything else about why</p>
<p style="text-align: right;">130</p> <p>1 A. It's a correct explanation, although</p> <p>2 this was a problem, an ongoing problem that we had</p> <p>3 in the unit where other teams were stealing other</p> <p>4 people's assignments.</p> <p>5 Q. Okay. And that was a problem not just</p> <p>6 with respect to Spalding and Echeverria, correct?</p> <p>7 A. Correct.</p> <p>8 (WHEREUPON, a certain document was</p> <p>9 marked Hanna Deposition Exhibit</p> <p>10 No. 14, for identification, as of</p> <p>11 08-12-2015.)</p> <p>12 BY MR. KING:</p> <p>13 Q. Ms. Hanna, I'm showing you what's been</p> <p>14 marked as Deposition Exhibit No. 14, which are a</p> <p>15 couple of emails you're copied on. I'd just ask</p> <p>16 you to take a look at these emails and let me know</p> <p>17 if you have a recollection of these emails.</p> <p>18 A. I do not.</p> <p>19 Q. Do you have any knowledge as to</p> <p>20 whether -- the conversation you said you had with</p> <p>21 Kevin Culhane where he told you he was specifically</p> <p>22 instructed not to give Danny and Shannon access</p> <p>23 to the databases, do you know whether that</p> <p>24 conversation occurred before or after</p>	<p style="text-align: right;">132</p> <p>1 they wouldn't have access to the databases?</p> <p>2 A. Correct.</p> <p>3 Q. Do you have any recollection of a</p> <p>4 conversation or conversations with Shannon Spalding</p> <p>5 before you went out on medical leave where you had</p> <p>6 talked about providing some kind of reports to her</p> <p>7 that related to VRI overtime?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recall what those reports were</p> <p>10 that you were going to provide to her?</p> <p>11 A. Those reports that show an exhibit such</p> <p>12 as No. 5.</p> <p>13 Q. Okay. You were going to send her the</p> <p>14 emails that would come from Lieutenant Cesario</p> <p>15 indicating who's assigned for VRI overtime such</p> <p>16 as Exhibit No. 5, correct?</p> <p>17 A. Correct.</p> <p>18 Q. And ultimately did you ever provide her</p> <p>19 with those emails?</p> <p>20 A. I don't believe I ever did.</p> <p>21 Q. Okay. You mentioned James O'Grady,</p> <p>22 Commander O'Grady being on the phone with</p> <p>23 Lieutenant Cesario.</p> <p>24 Do you know Commander O'Grady?</p>

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<p style="text-align: right;">133</p> <p>1 A. I do not.</p> <p>2 Q. Have you ever had a conversation with</p> <p>3 him?</p> <p>4 A. Never.</p> <p>5 Q. Are you aware of Commander O'Grady</p> <p>6 ever being in the Fugitive Apprehension Unit?</p> <p>7 A. I am not aware.</p> <p>8 Q. What about Nick Roti; do you know</p> <p>9 Nick Roti?</p> <p>10 A. I do not.</p> <p>11 Q. Did you ever have a conversation with</p> <p>12 Nick Roti as far as you know?</p> <p>13 A. Never.</p> <p>14 Q. You're not aware of Nick Roti ever being</p> <p>15 in the Fugitive Apprehension Unit?</p> <p>16 A. Not while I was there.</p> <p>17 Q. And my question about O'Grady and</p> <p>18 Roti being in the Fugitive Apprehension Unit, just</p> <p>19 to be clear, my question is did you ever see them</p> <p>20 physically inside of the Fugitive Apprehension</p> <p>21 Unit, O'Grady or Roti?</p> <p>22 A. I don't know who they are. I don't know</p> <p>23 what they look like.</p> <p>24 Q. Can you tell me what happened, your</p>	<p style="text-align: right;">135</p> <p>1 A. Not immediately I did not because I</p> <p>2 had prescheduled surgery for that Monday,</p> <p>3 April 1st. I already had a surgery scheduled.</p> <p>4 Q. For that injury or for something else?</p> <p>5 A. For something else.</p> <p>6 Q. Did you at some point apply for medical</p> <p>7 leave relating to the March 29th, 2013 injury?</p> <p>8 A. Yes, I did.</p> <p>9 Q. And you testified earlier you were</p> <p>10 approved for leave, but you have not been approved</p> <p>11 for duty disability, correct?</p> <p>12 A. Correct. I was approved for IOD,</p> <p>13 meaning it's an injury on duty. I was on IOD for a</p> <p>14 year, a little over a year, including my vacation</p> <p>15 time. From 3 September, 2014, to 19 September,</p> <p>16 2015 -- I'm sorry. That would be wrong. Has to</p> <p>17 be 3 September, '13, to 20 September, '14.</p> <p>18 Q. So September, 2013, to 2014 you were on</p> <p>19 IOD plus your vacation time?</p> <p>20 A. Correct, about September, '13, to</p> <p>21 September, '14.</p> <p>22 Q. And during that time you were getting</p> <p>23 your full pay or partial pay?</p> <p>24 A. Full pay.</p>
<p style="text-align: right;">134</p> <p>1 medical -- what happened to lead you to have to</p> <p>2 go out on medical leave? Was there an injury or</p> <p>3 something?</p> <p>4 A. I had an injury on March 29th, 2013.</p> <p>5 Q. Okay. Was that an injury while you were</p> <p>6 at work?</p> <p>7 A. Yes, it was.</p> <p>8 Q. And tell me what happened.</p> <p>9 A. I was delivering papers that I was</p> <p>10 ordered by Lieutenant Cesario to bring to the front</p> <p>11 office that regarded wanted subjects, confidential</p> <p>12 information and working in accordance with the</p> <p>13 U.S. Marshal's office. And on my return back to my</p> <p>14 office, I, unbeknownst to me, did not see the hole</p> <p>15 in the floor with a nail protruding from the hole.</p> <p>16 And my belief is that the tip of my shoe got caught</p> <p>17 on that nail and I proceeded to go flying and hit</p> <p>18 both of my knees on the floor.</p> <p>19 Q. This floor, was this inside the</p> <p>20 Fugitive Apprehension Unit or somewhere else?</p> <p>21 A. It's on the main floor, Fugitive</p> <p>22 Apprehension Unit 606.</p> <p>23 Q. And did you apply for any kind of</p> <p>24 medical leave?</p>	<p style="text-align: right;">136</p> <p>1 Q. And benefits?</p> <p>2 A. Yes.</p> <p>3 Q. And then after that one year expired</p> <p>4 in September of 2014, you started getting reduced</p> <p>5 pay and no benefits, is that correct?</p> <p>6 A. I started getting reduced pay because</p> <p>7 my IOD time was expired. So I had to file for</p> <p>8 ordinary -- or for disability. When you file for</p> <p>9 disability, you go into a 50 percent pay status</p> <p>10 with benefits until your hearing at the pension</p> <p>11 board.</p> <p>12 Q. And when did your IOD expire when you</p> <p>13 were getting full pay and benefits?</p> <p>14 A. The last day that I worked full duty,</p> <p>15 you know, as a police officer, working getting full</p> <p>16 pay was 19 September, 2014.</p> <p>17 Q. But you weren't actively working during</p> <p>18 that IOD period; you were on leave, correct?</p> <p>19 A. Correct. We have 365 days.</p> <p>20 Q. Gotcha. Do you know what your last day</p> <p>21 you actively worked in the unit was?</p> <p>22 A. It was Labor Day weekend. So</p> <p>23 3 September was a Tuesday.</p> <p>24 Q. That's fine. September of 2013?</p>

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<p style="text-align: right;">137</p> <p>1 A. It had to be -- well, it would be</p> <p>2 3, 2, 1. So it was actually August, the end of</p> <p>3 August, 2013 --</p> <p>4 Q. Thank you.</p> <p>5 A. -- the last Friday.</p> <p>6 Q. I may have asked you this. Do you</p> <p>7 recall when you got the decision that your</p> <p>8 disability, duty disability was denied?</p> <p>9 A. Yes. I had my hearing date on</p> <p>10 29 May, 2015.</p> <p>11 Q. That was the hearing date?</p> <p>12 A. Yes.</p> <p>13 Q. And did they make a determination that</p> <p>14 day?</p> <p>15 A. Yes.</p> <p>16 Q. Your affidavit is dated November 14,</p> <p>17 2014. Did you sign the affidavit after your one</p> <p>18 year IOD had expired?</p> <p>19 A. Yes.</p> <p>20 Q. And had you at that point already put</p> <p>21 in your application for disability?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know who actually typed your</p> <p>24 affidavit?</p>	<p style="text-align: right;">139</p> <p>1 affidavit drafted and signing it, other than</p> <p>2 Christopher Smith, was there anyone else that</p> <p>3 you dealt with with respect to the affidavit?</p> <p>4 A. There was a female in there.</p> <p>5 Q. Another lawyer in Chris' office?</p> <p>6 A. I don't believe she was a lawyer. Maybe</p> <p>7 an assistant. I believe she's the one who actually</p> <p>8 typed up the affidavit.</p> <p>9 Q. Did you meet with them in Chris' law</p> <p>10 office?</p> <p>11 A. Yes.</p> <p>12 Q. And had there been any prior</p> <p>13 conversations on the phone?</p> <p>14 A. Negative.</p> <p>15 Q. Okay. You indicated you contacted him?</p> <p>16 A. Yes.</p> <p>17 Q. And what -- did you just say you'd like</p> <p>18 to come in and meet with him?</p> <p>19 A. I would like to come forward and do the</p> <p>20 right thing. And I'm on disability. I'm no longer</p> <p>21 with the department. So I'm not in fear of</p> <p>22 breaking the code of silence and being retaliated</p> <p>23 against like Danny and Shannon were. And I have a</p> <p>24 conscience.</p>
<p style="text-align: right;">138</p> <p>1 A. I do not.</p> <p>2 Q. Okay. Did you ever receive a draft or</p> <p>3 a version that is different than Deposition Exhibit</p> <p>4 No. 1?</p> <p>5 A. No, I didn't receive a copy of it.</p> <p>6 Q. Is today the first time you're seeing</p> <p>7 the affidavit?</p> <p>8 A. No.</p> <p>9 Q. My question I guess is were you ever</p> <p>10 presented with a draft of the affidavit to sign</p> <p>11 and you said there was something in there you</p> <p>12 wouldn't agree to or wouldn't sign off on?</p> <p>13 A. No.</p> <p>14 Q. So nobody asked you to say something</p> <p>15 in the affidavit that you had a problem with and</p> <p>16 said, no, I can't, I can't say that?</p> <p>17 A. No.</p> <p>18 Q. When did you see the version that had a</p> <p>19 full Paragraph 36 in it?</p> <p>20 A. I would say on 19 November, 2014.</p> <p>21 Q. So it's your testimony that the version</p> <p>22 you signed you think had a complete Paragraph 36?</p> <p>23 A. Yes.</p> <p>24 Q. And in this process of having the</p>	<p style="text-align: right;">140</p> <p>1 Q. I just asked what you said to him. Is</p> <p>2 that what you said to him?</p> <p>3 A. That's what I said to him.</p> <p>4 Q. Was the subject of signing an affidavit</p> <p>5 raised by you or by Chris or someone else?</p> <p>6 A. I don't understand.</p> <p>7 Q. Okay. You call him up. You say I want</p> <p>8 to come in and I want to meet with you. Then you</p> <p>9 meet with him and a young lady. Who brings up the</p> <p>10 topic of you signing an affidavit, you or one of</p> <p>11 them?</p> <p>12 A. I tell him I want to sign -- he asks me</p> <p>13 after I give him the information, are you willing</p> <p>14 to give a sworn affidavit with the information you</p> <p>15 are providing me?</p> <p>16 Q. I see.</p> <p>17 A. And I say, yes.</p> <p>18 Q. Okay. And how did you get the affidavit</p> <p>19 back? Did they type it up right there while you</p> <p>20 were there or was it sent to you later?</p> <p>21 A. No, right then that same day.</p> <p>22 Q. So the young lady or the lady typed</p> <p>23 it up and then you read it and signed it, is that</p> <p>24 correct?</p>

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<p style="text-align: right;">141</p> <p>1 A. Yes.</p> <p>2 Q. And when you reviewed it, you were</p> <p>3 comfortable that everything in it was true and</p> <p>4 accurate? You didn't ask them to make any changes</p> <p>5 or take this out or add that, is that correct?</p> <p>6 A. This is not the first draft that they</p> <p>7 did.</p> <p>8 Q. Okay. I think I asked you about drafts.</p> <p>9 A. There were several of them and there</p> <p>10 were mistakes. Then she would go back and correct</p> <p>11 it. Then I would find another mistake and she'd</p> <p>12 correct that. I think that happened twice. And</p> <p>13 this is actually the official third copy that I</p> <p>14 didn't find an error.</p> <p>15 Q. Okay. What do you recall being the</p> <p>16 errors or problems with the first draft?</p> <p>17 A. I don't recall.</p> <p>18 Q. Do you recall what the errors or</p> <p>19 problems were with the second draft?</p> <p>20 A. No, I don't recall.</p> <p>21 Q. With respect to either of the drafts, do</p> <p>22 you recall whether the errors were typo type errors</p> <p>23 or they had typed something that was not correct as</p> <p>24 you understood it?</p>	<p style="text-align: right;">143</p> <p>1 BY MR. KING:</p> <p>2 Q. When you met with Mr. Smith and the</p> <p>3 woman in his office, was there anything that you</p> <p>4 indicated you wanted them to put in the affidavit</p> <p>5 but they didn't?</p> <p>6 A. No.</p> <p>7 Q. But you were comfortable that the</p> <p>8 affidavit reflected all of the relevant information</p> <p>9 that you had on the matter?</p> <p>10 A. Yes.</p> <p>11 Q. And it's your testimony that before</p> <p>12 you reached out to Shannon Spalding and Dan</p> <p>13 Echeverria's attorney in the lawsuit you had</p> <p>14 no conversation with Shannon Spalding or Dan</p> <p>15 Echeverria, is that correct?</p> <p>16 A. That's not correct. I had conversations</p> <p>17 with them.</p> <p>18 Q. Did you have any conversations with them</p> <p>19 about contacting their attorney or giving an</p> <p>20 affidavit in the case?</p> <p>21 A. No.</p> <p>22 Q. With respect to the murder case that</p> <p>23 you said was assigned to Spalding and Echeverria</p> <p>24 and then it was taken away from them, were they</p>
<p style="text-align: right;">142</p> <p>1 A. I don't recall.</p> <p>2 Q. Okay. Do you have any recollection of</p> <p>3 saying you can't agree to -- you're not going to</p> <p>4 sign off on something that was in the first draft</p> <p>5 or the second draft?</p> <p>6 A. No.</p> <p>7 Q. You don't know if the corrections were</p> <p>8 just typos or something substantive?</p> <p>9 A. I never made the statement that I</p> <p>10 wouldn't sign something that was in there. So it</p> <p>11 wouldn't have been of any substance. It had to</p> <p>12 have been a typo.</p> <p>13 Q. But you don't remember what they were?</p> <p>14 A. I do not.</p> <p>15 Q. Did you take a copy of the affidavit</p> <p>16 after you signed it?</p> <p>17 A. No, I didn't.</p> <p>18 Q. Since you signed it that day in the</p> <p>19 office, when you met with Mr. Taren, was that the</p> <p>20 very next time you saw the affidavit?</p> <p>21 A. Yes.</p> <p>22 MR. KING: Give me a sec.</p> <p>23 (WHEREUPON, there was a short</p> <p>24 interruption.)</p>	<p style="text-align: right;">144</p> <p>1 the only two assigned to the case, if you recall?</p> <p>2 A. Yes.</p> <p>3 Q. And do you have any recollection whether</p> <p>4 that case had previously been assigned to someone</p> <p>5 else?</p> <p>6 A. I have no recollection.</p> <p>7 MR. KING: I don't have any further questions.</p> <p>8 MR. TAREN: I have a few matters of</p> <p>9 clarification.</p> <p>10 EXAMINATION</p> <p>11 BY MR. TAREN:</p> <p>12 Q. Ms. Hanna, do you recall when the</p> <p>13 Fugitive Apprehension Unit moved from Homan Square</p> <p>14 to Harrison and Kedzie?</p> <p>15 A. In June of 2012.</p> <p>16 Q. Okay. And was there a period of time</p> <p>17 when the people in the unit were going back and</p> <p>18 forth?</p> <p>19 A. Yes, for many weeks.</p> <p>20 Q. Directing your attention to your</p> <p>21 affidavit, Paragraph 13, we had some questioning</p> <p>22 about where the conversation that's referred to in</p> <p>23 that paragraph took place.</p> <p>24 Do you know for certain -- do you recall</p>

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<p style="text-align: right;">145</p> <p>1 for certain whether the conversation took place at</p> <p>2 Homan Square or at Harrison and Kedzie?</p> <p>3 A. No, I can't be certain.</p> <p>4 Q. The conversation that you referred to in</p> <p>5 there, did that take place during the period of</p> <p>6 time when the unit was going back and forth?</p> <p>7 A. Yes.</p> <p>8 Q. You were questioned about Paragraph 2</p> <p>9 of your affidavit, but I believe that Mr. King did</p> <p>10 not ask you to recount what Lieutenant Cesario</p> <p>11 stated in that conversation.</p> <p>12 Would you tell us what Lieutenant</p> <p>13 Cesario said to you?</p> <p>14 A. Lieutenant Cesario called Coleen and I</p> <p>15 into his office at Homan Square and he closed the</p> <p>16 door and sat down in the chairs and he informed us</p> <p>17 of two new officers who were coming to the unit and</p> <p>18 that they were IAD rats.</p> <p>19 Q. And did he instruct you in any way about</p> <p>20 how you should approach them?</p> <p>21 A. To be very leery of them.</p> <p>22 Q. To your knowledge, was anyone else in</p> <p>23 the unit told that Danny or Shannon were from IAD?</p> <p>24 A. Not to my knowledge. I didn't partake</p>	<p style="text-align: right;">147</p> <p>1 A. She was very upset and her response</p> <p>2 about I have Gary's -- yeah, I have Gary's</p> <p>3 cellphone -- or I have Gary's phone number right</p> <p>4 here was facetious. It was -- she was just trying</p> <p>5 to make light of the situation, but she was very</p> <p>6 upset.</p> <p>7 MR. TAREN: That's all I have.</p> <p>8 MR. KING: A couple follow-ups.</p> <p>9 FURTHER EXAMINATION</p> <p>10 BY MR. KING:</p> <p>11 Q. Counsel just asked you about Paragraph 2</p> <p>12 of your affidavit and what Lieutenant Cesario</p> <p>13 allegedly said to you and Coleen Dugan.</p> <p>14 If Coleen Dugan testified under oath in</p> <p>15 this case that Lieutenant Cesario never referred</p> <p>16 to the plaintiffs as IAD rats and never told her to</p> <p>17 be very leery of them, is it your testimony that</p> <p>18 that's a lie?</p> <p>19 A. Yes, it is.</p> <p>20 Q. I'm gathering since you've not spoken</p> <p>21 to her and blocked her from your phone, you don't</p> <p>22 think very highly of Coleen Dugan at this point, is</p> <p>23 that fair to say?</p> <p>24 A. It's very fair to say.</p>
<p style="text-align: right;">146</p> <p>1 in actual conversations, but it was common</p> <p>2 knowledge.</p> <p>3 Q. What do you base that on?</p> <p>4 A. Everyone talking about it.</p> <p>5 Q. Did you hear other individuals talking</p> <p>6 about Danny and Shannon coming from IAD?</p> <p>7 A. Yes, after Lieutenant Cesario had told</p> <p>8 Coleen and I.</p> <p>9 Q. Mr. King asked you about the</p> <p>10 conversation that you had after Cesario introduced</p> <p>11 you to Shannon and Danny where you said to them, so</p> <p>12 you two are the IAD rats.</p> <p>13 Do you recall that --</p> <p>14 A. Yes.</p> <p>15 Q. -- those questions? Okay.</p> <p>16 And I believe that you testified that</p> <p>17 Shannon made some response about having Gary's</p> <p>18 cellphone?</p> <p>19 A. Yes.</p> <p>20 Q. What was her tone of voice like when she</p> <p>21 made that response to you?</p> <p>22 MR. KING: Object to the form.</p> <p>23 You can answer.</p> <p>24 BY THE WITNESS:</p>	<p style="text-align: right;">148</p> <p>1 Q. Counsel also just asked you whether</p> <p>2 you heard other individuals say that Spalding and</p> <p>3 Echeverria had come from IAD.</p> <p>4 Do you recall any other -- other than</p> <p>5 what's in Paragraph 2 of your affidavit, do you</p> <p>6 recall any specific individuals who made reference</p> <p>7 to them coming from IAD or having worked at IAD?</p> <p>8 A. I don't recall specific individuals.</p> <p>9 Q. And, likewise, other than what you have</p> <p>10 in Paragraph 2 of your affidavit, do you have any</p> <p>11 recollection of anybody referring to Spalding or</p> <p>12 Echeverria as rats or IAD rats?</p> <p>13 A. I don't recall the specifics or who</p> <p>14 referred to them as IAD rats other than the</p> <p>15 lieutenant having the conversation with us.</p> <p>16 Q. You're not aware of anyone other than</p> <p>17 the lieutenant in the conversation referenced in</p> <p>18 Paragraph 2 of your affidavit -- you're not aware</p> <p>19 of anyone else calling Spalding or Echeverria rats</p> <p>20 or IAD rats, correct?</p> <p>21 A. Myself and the lieutenant.</p> <p>22 Q. Okay. Only you and the lieutenant</p> <p>23 referred to them as IAD rats?</p> <p>24 A. That is what I can recall.</p>

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<p style="text-align: right;">149</p> <p>1 MR. KING: That's all.</p> <p>2 MR. TAREN: Okay. We'll reserve signature.</p> <p>3 (Time Noted: 1:16 p.m.)</p> <p>4 FURTHER DEPONENT SAITH NOT.</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">151</p> <p>1 hand of office at Chicago, Illinois, this 2nd day</p> <p>2 of September, 2015.</p> <p>3</p> <p>4</p> <p>5</p> <p>6 Julie A. Conroy, CSR No. 84-2251</p> <p>7 Notary Public, DuPage County, Illinois.</p> <p>8 My commission expires 6/6/17.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">150</p> <p>1 STATE OF ILLINOIS)</p> <p>2) SS:</p> <p>3 COUNTY OF DUPAGE)</p> <p>4 I, JULIE A. CONROY, CSR No. 84-2251, a</p> <p>5 Notary Public within and for the County of DuPage,</p> <p>6 State of Illinois, and a Certified Shorthand</p> <p>7 Reporter of said state, do hereby certify:</p> <p>8 That previous to the commencement of the</p> <p>9 examination of the witness, the witness was duly</p> <p>10 sworn to testify the whole truth concerning the</p> <p>11 matters herein;</p> <p>12 That the foregoing deposition transcript</p> <p>13 was reported stenographically by me, was thereafter</p> <p>14 reduced to typewriting under my personal direction</p> <p>15 and constitutes a true record of the testimony</p> <p>16 given and the proceedings had;</p> <p>17 That the said deposition was taken</p> <p>18 before me at the time and place specified;</p> <p>19 That I am not a relative or employee or</p> <p>20 attorney or counsel, nor a relative or employee of</p> <p>21 such attorney or counsel for any of the parties</p> <p>22 hereto, nor interested directly or indirectly in</p> <p>23 the outcome of this action.</p> <p>24 IN WITNESS WHEREOF, I do hereunto set my</p>	<p style="text-align: right;">152</p> <p>1 I N D E X</p> <p>2 WITNESS EXAMINATION</p> <p>3 JANET HANNA</p> <p>4 BY MR. KING 3, 147</p> <p>5 BY MR. TAREN 144</p> <p>6</p> <p>7 E X H I B I T S</p> <p>8 NUMBER PAGE</p> <p>9 Hanna Deposition</p> <p>10 Exhibit No. 1 41</p> <p>11 Exhibit No. 2 119</p> <p>12 Exhibit No. 3 119</p> <p>13 Exhibit No. 4 120</p> <p>14 Exhibit No. 5 120</p> <p>15 Exhibit No. 6 120</p> <p>16 Exhibit No. 7 120</p> <p>17 Exhibit No. 8 123</p> <p>18 Exhibit No. 9 125</p> <p>19 Exhibit No. 10 126</p> <p>20 Exhibit No. 11 126</p> <p>21 Exhibit No. 12 127</p> <p>22 Exhibit No. 13 128</p> <p>23 Exhibit No. 14 130</p> <p>24 Exhibit No. 15 131</p>

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<p>1 DEPOSITION ERRATA SHEET</p> <p>2</p> <p>3</p> <p>4 Assignment No. J0178237</p> <p>5 CHICAGO POLICE OFFICER SHANNON SPALDING, et al.</p> <p>6 vs. CITY OF CHICAGO, et al.</p> <p>7</p> <p>8 DECLARATION UNDER PENALTY OF PERJURY</p> <p>9 I declare under penalty of perjury</p> <p>10 that I have read the entire transcript of</p> <p>11 my Deposition taken in the captioned matter</p> <p>12 or the same has been read to me, and</p> <p>13 the same is true and accurate, save and</p> <p>14 except for changes and/or corrections, if</p> <p>15 any, as indicated by me on the DEPOSITION</p> <p>16 ERRATA SHEET hereof, with the understanding</p> <p>17 that I offer these changes as if still under</p> <p>18 oath.</p> <p>19</p> <p>20 Signed on the _____ day of</p> <p>21 _____, 20____.</p> <p>22</p> <p>23 _____</p> <p>24 JANET HANNA</p>	<p>1 DEPOSITION ERRATA SHEET</p> <p>2 Page No. _____ Line No. _____ Change to: _____</p> <p>3 _____</p> <p>4 Reason for change: _____</p> <p>5 Page No. _____ Line No. _____ Change to: _____</p> <p>6 _____</p> <p>7 Reason for change: _____</p> <p>8 Page No. _____ Line No. _____ Change to: _____</p> <p>9 _____</p> <p>10 Reason for change: _____</p> <p>11 Page No. _____ Line No. _____ Change to: _____</p> <p>12 _____</p> <p>13 Reason for change: _____</p> <p>14 Page No. _____ Line No. _____ Change to: _____</p> <p>15 _____</p> <p>16 Reason for change: _____</p> <p>17 Page No. _____ Line No. _____ Change to: _____</p> <p>18 _____</p> <p>19 Reason for change: _____</p> <p>20 Page No. _____ Line No. _____ Change to: _____</p> <p>21 _____</p> <p>22 Reason for change: _____</p> <p>23 SIGNATURE: _____ DATE: _____</p> <p>24 JANET HANNA</p>
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